

## GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, Life Elevated Processing (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- ☐ non-public financial statements
- ☒ specific employee name and contact information
- ☒ specific customer information, client lists, or subscription lists
- ☒ other (specify):

Business strategy, process, and equipment that is proprietary.

This claim is asserted because this information requires protection as it includes:

☒ trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

☒ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

There are equipment, business processes, and market differentiators that are IP for LEP.

Signed: \_\_\_\_\_

On behalf of (company):

Date:

Life Elevated Processing

7-28-23

Utah Department of Agriculture & Food 4315 South 2700 West TSOB South Bldg, Floor 2 Taylorsville, UT 84129-2128	<b>MEDICAL CANNABIS PROCESSING ESTABLISHMENT APPLICATION CHECKLIST</b>	Website: <a href="http://www.ag.utah.gov">www.ag.utah.gov</a> Phone: 801-982-2200 Email: cannabis@utah.gov
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**The Application submitted by a Cannabis Processing Facility and approved by the Establishment Board will be considered the business's operation plan. UDAF Inspectors will use the operation plan for regulatory purposes. Ensure all information is complete, current, and accurate.**

The information provided by the applicant for a Medical Cannabis Production Establishment must fit within the following Guidelines:

- Maximum 50 pages
- Information provided must be clear and concise; do not repeat information
- Ensure each section speaks to the requested information; and are in the same order as application
- Everything in the application is contained in a single PDF document.

Utah Department of Agriculture & Food 4315 South 2700 West TSOB South Bldg, Floor 2 Taylorsville, UT 84129-2128	<b>MEDICAL CANNABIS PROCESSING ESTABLISHMENT APPLICATION</b>	<b>Medical Cannabis Program</b>  Application Number: _____ (office use only)
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*Medical Cannabis Processor Facility is multi-tiered:*

*(a) A tier 1 processor license allows the licensee to process, manufacture, dry, cure, package, and label cannabis and cannabis products for sale or transfer to another cannabis processing facility, a medical cannabis pharmacy, or the state central fill medical cannabis pharmacy. A tier 1 processing license is \$100,000 per year.*

*(b) A tier 2 processor license allows the licensee to package and label cannabis and cannabis products for sale or transfer to another cannabis processing facility or a medical cannabis pharmacy. A tier 2 processing license is \$35,000 per year.*

**All Facilities must pay a non-refundable application fee of \$1,250.00 before the application is reviewed. Call UDAF's number 801.982.2200 and ask for accounting to make the payment.**

*Prior to approving an application, the department may contact any applicant and request additional supporting documentation or information. The department may conduct face-to-face interviews with an applicant if needed.*

*The department shall inspect the premises to determine if the applicant complies with state laws, administrative rules and best practice standards.*

#### Ownership Information

- Ownership Entity: River Front Wellness, LLC  
 Entity Type: Individual ☐ Partnership ☐ Corporation ☐ Limited Liability Company ☒
- DBA: (assumed name of business) Life Elevated Processing, LLC
- Processing Facility Address: \_\_\_\_\_  
 STREET CITY STATE ZIP
- Mailing Address: SAME  
 (IF DIFFERENT) STREET CITY STATE ZIP
- Business Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ Other/office: \_\_\_\_\_

6. Facility Manager Contact: Justin Arriola Phone number: [REDACTED] Email: [REDACTED]
7. Contact Person for Inspections: Justin Arriola Phone number: [REDACTED] Email: [REDACTED]
8. Contact Person for Sampling / Results: Ron Denter Phone number: [REDACTED] Email: [REDACTED]
9. Additional Contact: Justin Arriola Phone number: [REDACTED] Email: [REDACTED]
10. Other industrial hemp and/or medical cannabis licenses currently or previously held by applicant/entity/principals:  
INDUSTRIAL HEMP PROCESSING LICENSE # 8002-20267

### Ownership Information

*An owner is a person who, if the company is privately held, has a financial **or voting interest** of 2% or greater in the cannabis production establishment; or if the entity is publicly traded has more than a 2% financial interest in the company; or is an individual who has the power to direct or cause the management or control of a facility, in other words is a general manager of daily operations.*

List all Owners and their positions in the Company.

Legal Name (First & Last)	Role in the Company's Finances and Decisions	DATE OF BIRTH mm/dd/yy	FINGERPRINTS SUBMITTED Y/N
No ownership changes			
See Attached List			

11. The applicant understands that as an applicant and potential licensee you are **REQUIRED** to know the current statutory law, administrative rules and Departmental policies and comply in full? Yes ☒ No ☐

12. Criminal History Background Documents must be submitted for all owners. Background Forms **should NOT be part of the application**. Go to <https://medicalcannabis.utah.gov/production/processors/> for background check information

13. Descriptions of the credentials and experience of each officer, director, and owner and prospective employee who have a financial or voting interest of 2% or greater in the proposed cannabis production establishment; or the power to direct or cause the management or control of a proposed cannabis production establishment

- ☒ A. A description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses.

### Processing Facility Information

14. Application for: Tier 1 ☒ Tier 2 ☐
15. Projected Opening Day: 5 Days/hours of operation: [REDACTED]

### Processing Establishment Property Information

16. Submit for Company's Current Cannabis Processing Facility a Blueprint with:
- a) the square footage of the areas where cannabis is extracted;
  - b) the square footage of the area(s) where cannabis products are manufactured;
  - c) location of all extraction machinery/ stationary equipment;
  - d) the square footage of the areas used for storage and what type of product is stored there (i.e crude oil, untested products, final tested product) ;
  - e) the areas where cannabis is to be dried, trimmed, and cured (if applicable);
  - f) the square footage of the areas where cannabis is to be packaged;
  - g) the location of the toilet facilities and hand washing facilities;
  - h) the location of a break room;
  - i) the location of lobby or area where non-agents can access.
  - j) the location of the areas to be used for loading and unloading of cannabis products for transportation; and
  - k) the location of all cameras and external lights.
17. Proximity: Confirm the proposed location is 1000 feet or more by pedestrian travel to a "community location" and is 600 feet or more by pedestrian travel to any district zoned as primarily residential. Yes

### Operating Plan

18. List all product types that will be produced in the upcoming year. (i.e Vapes, Salves, Flower)
19. List all extraction methods used at the facility. Include all solvents, chemicals, and equipment used.
20. Is the facility doing CBD to THC conversion? If yes, outline the facility's methods.
21. Provide all written emergency procedures for Fire, Chemical Spills, and other Emergencies. *This information plus the Material Safety Data Sheet (MSDS) must be easily accessed by all employees.*
22. Submit the facility's most up-to-date security plan. Security plans shall include:
- a) description of security alarm system;
  - b) person(s) notified of potential security breaches and alerts;
  - c) video storage device location: local or cloud storage
  - d) procedures to provide UDAF inspectors immediate access to current and archived video footage when requested.
  - e) any additional security measure in place that exceed the security requirements outlined in R68-28-6
23. Provide the facility's storage protocols, both short and long-term, to ensure all cannabis is stored in a manner that is sanitary and preserves the integrity of the cannabis in accordance to R68-28-9.
24. Provide the processing facility's written plan and procedures to handle potential recalls in accordance to R68-28-14. Include:
- a) The name(s) of persons designated as recall coordinator (R68-28-14(2a);
  - b) the contact information for how to reach staff member(s);
  - c) how will affected parties be notified;
  - d) a written procedure with specifics of what to do in case of a product recall.
25. Submit procedures on how the facility will dispose of Product that fails quality assurance testing. A destruction plan must be written for every product type produced at the processing facility, and must be in compliance with federal and state laws laid out in Utah Code 4-41a-405 and Rule R68-27-15 Cannabis Waste Disposal.

26. Detail the procedures the facility has employed to meet the transport and transfer requirements of Utah Rule R68-28-13. Include the make and model of every vehicle the company will use to transport Cannabis Material.

#### **Compliance**

27. Submit proof of a \$50,000 performance bond.
28. The facility understands all scales must be certified, as outlined in Utah Administrative Rule 68-28-4 (8). Visit <https://ag.utah.gov/businesses/regulatory-services/weights-measures/> for more information.
- a. Agree
29. Submit proof of registration as a Manufactured Food Establishment with UDAF's Regulatory Services.
30. Submit a current local business license or permit from the city/municipality.
31. The Facility is responsible for ensuring all employees have background checks and are registered in the Electronic Verification System (EVS). The company is also responsible for collecting agent cards and notifying the Department when an agent leaves their facility. Failure to comply will result in a citation and a fine to the company.
32. Attach all approved Change Requests to the application.
33. Provide the proposed medical cannabis processing facility's employee training standards.
34. Submit the proposed medical cannabis processing facility's security plan. Explain how the processing facility will operate in a facility that meets all security requirements in Utah Administrative Rule R68-28-6.
35. Describe the medical cannabis processing facility's inventory control system; Detail the procedures the cannabis processing facility will employ to meet the Inventory Control System requirements of Utah Code 4-41a-103 Inventory Control System and Utah Administrative Rule R68-28-7 Inventory Control. Including a description of how the facility will be compliance with section 26-61a-103 and use the state electronic verification system to track facility agents.
36. Provide the proposed medical cannabis processing facility's storage protocols, both short and long-term, to ensure all cannabis is stored in a manner that is sanitary and preserves the integrity of the cannabis.
37. Provide the proposed medical cannabis processing facility's written plan and procedures to handle potential recalls and destruction of cannabis because of contamination;
- b. Include the person(s) responsible for enacting a recall.
- c. Outline specifically how each product type in your facility would get destroyed.
38. Submit the procedures documenting how the cannabis processing facility will dispose of excess and medical cannabis waste in compliance with federal and state laws.
39. Provide the facility's plan and procedures to have a representative sample of cannabis and cannabis tested by an independent cannabis testing laboratory to determine if the product is safe for human consumption.

#### **40.Compliance**

41. Detail the procedures the medical cannabis processing facility will employ to meet the transport and transfer requirements of Utah Code 4-41a-404 "Cannabis, cannabis product, or medical cannabis device transportation" and Utah Administrative Rule R68-28-13. Transportation.
42. Provide proof of a \$50,000 performance bond that a surety business in the state issues. This can be done after and intent to license has been issued.
43. Registration as a Manufactured Food Establishment with the UDAF's Regulatory Services

44. Copy of current local business license or letter of intent from the county/municipality, or a letter from the city/municipality stating their intent to issue a permit once the facility is licensed.

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant also understands that failure to adhere to or maintain the qualifications of their license, may result in suspension or revocation of the license and/or forfeiture of the performance bond or any other remedies allowed by law.

Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, change in testing methods, equipment, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application.

The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agents immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

#### Disclaimer

Applicant acknowledges and understands that cultivating, possessing, using, distributing and/or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary. Nothing in this Application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this Registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this Application or the Registration Card shall be construed as advice with regard to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that he/she has read and understands the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

The undersigned hereby makes application to the Utah Department of Agriculture and Food and certifies that the information contained herein and attached here is true and correct.

If selected for a license, applicant agrees to pay the required license fee (\$100,000 Tier 1 or \$35,000 Tier 2) within 30 days of being notified of licensure decision.

Justin Arriola

Managing Partner, River Front Wellness, LLC

Applicant/Owner of business

Title/Position



7/14/23

Applicant Signature

Date



MEDICAL CANNABIS PROCESSING 2023 RENEWAL APPLICATION  
LIFE ELEVATED PROCESSING, LLC

1-13 [See application](#)

14. Submit for Company's Current Indoor Cannabis Processing Facility a Blueprint with: [\(See attached diagram\)](#)
1. the square footage of the areas where cannabis is extracted; [770 SQ FT](#)
  2. the square footage of the area(s) where cannabis products are manufactured; [400 SQ FT](#)
  3. location of all extraction machinery/ stationary equipment; [\(see attached diagram\)](#)
  4. the square footage of the areas used for storage and what type of product is stored there (i.e crude oil, untested products, final tested product); [160 SQ FT – crude oil, untested products, final tested products, raw material](#)
  5. the areas where cannabis is to be dried, trimmed, and cured (if applicable); [\(see attached diagram\)](#)
  6. the square footage of the areas where cannabis is to be packaged; [400 SQ FT](#)
  7. the location of the toilet facilities and hand washing facilities; [\(see attached diagram\)](#)
  8. the location of a break room; [\(see attached diagram\)](#)
  9. the location of lobby or area where non-agents can access; [\(see attached diagram\)](#)
  10. the location of the areas to be used for loading and unloading of cannabis products for transportation; [\(see attached diagram\)](#)
  11. the location of all cameras and external lights; [\(see attached diagram\)](#)

15. List all product types that will be produced in the upcoming year

- VAPE CARTS
- CONCENTRATES
- EDIBLES
- BALM
- TINCTURES
- SOLVENTLESS EXTRACTS
- TRANSDERMAL PATCHES (LEP will obtain approval via a separate Change Request Form with the department before producing)
- LOZENGES (LEP will obtain approval via a separate Change Request Form with the department before producing)

16. List all extraction methods used at the facility. Include all solvents, chemicals, and equipment used.

[CO2](#)

- [SOAK BIOMASS IN CO2 FOR VARIOUS PERIODS OF TIME IN THE VITALIS CO2 MACHINE, INCREASE PRESSURE CYCLE FOR 10 HRS,](#)
- [WINTERIZE PER EXISTING SOP](#)

[ICE WATER](#)

- [BIOMASS AND ICE WATER ARE PUT INTO VARIOUS MACHINE AND FILTER BAGS TO PERFORM MANUAL AGITATION. THIS PROCESS STIRS AND SEPARATES TRICHOMES FROM THE PLANT. THEN FILTERS OUT THAT PLANT MATTER AND LEAVES BEHIND TRICHOME RICH EXTRACT. MATERIAL CAN BE TREATED WITH UV LIGHT FOR SHORT PERIODS OF TIME TO REMOVE EXCESS MICROBIALS THAT MAY ACCUMULATE DUE TO CONCENTRATION OF CANNABINOID RICH MATERIAL.](#)

[ROSIN PRESS](#)

- [BIOMASS OR TRICHOME RICH EXTRACT FROM BUBBLE HASH IS PUT INTO FILTER BAGS AND MACHINE PRESSES FOR EXTRACTION USING HEAT AND PRESSURE.](#)

17. Is the facility doing CBD to THC conversion? If yes, outline the facility's methods [NO](#)

18. Provide all written emergency procedures for Fire, Chemical Spills, and other Emergencies. This information plus the Material Safety Data Sheet (MSDS) must be easily accessed by all employees.

[FIRE EMERGENCIES](#)

[BEFORE A FIRE:](#)

- LEP HAS A DESIGNATED ASSEMBLY LOCATION 150 FT AWAY IN CASE OF INCIDENTS THAT REQUIRE EVACUATION.
- LEP ENSURES DURING EMPLOYEE TRAINING THAT ALL TEAM KNOW THE LOCATIONS OF FIRE EXTINGUISHERS AND HOW TO USE THEM. FIRE EXTINGUISHERS MEET OR EXCEED LOCAL FIRE DEPARTMENT REQUIREMENTS AND EXPECTATIONS.

LEP FOLLOWS RECOMMENDED PROCEDURES TO PREPARE FOR EMERGENCIES THAT REQUIRE EVACUATION, SUCH AS KEEPING DOORWAYS, CORRIDORS AND EGRESS PATHS CLEAR AND UNOBSTRUCTED; MAKING SURE THAT ALL ELECTRICAL APPLIANCES AND CORDS ARE IN GOOD CONDITION AND UL APPROVED; NOT OVERLOADING ELECTRICAL OUTLETS; AND USING SURGE PROTECTED MULTI-OUTLET POWER STRIPS AND EXTENSION CORDS WHEN NECESSARY. EXTENSION CORDS WITHOUT SURGE PROTECTION ARE AVOIDED. ADDITIONAL INFORMATION ON ELECTRICAL SAFETY IS IN THE HEALTH AND SAFETY PLAN. FIRE EXTINGUISHERS ALL DOORS TO ROOMS CONTAINING HAZARDOUS MATERIALS ARE CLEARLY MARKED ACCORDING TO THE NFPA CLASSIFICATION SYSTEM.

#### DURING A FIRE:

- ARE MOUNTED AND MAINTAINED ACCORDING TO REGULATION
- EMPLOYEES AWARE OF THE FIRE WILL SET OFF THE PANIC ALARM AND BEGIN EVACUATION.
- WHEN EVACUATING THE BUILDING, TEAM ARE ADVISED TO FEEL DOORS FOR HEAT BEFORE OPENING THEM TO BE CERTAIN THERE IS NO FIRE DANGER ON THE OTHER SIDE.
- IF THERE IS SMOKE IN THE AIR, STAY LOW TO THE GROUND, ESPECIALLY YOUR HEAD, TO REDUCE INHALATION EXPOSURE. KEEP ONE HAND ON THE WALL TO PREVENT DISORIENTATION AND CRAWL TO THE NEAREST EXIT.
- ONCE IN A SAFE LOCATION, CALL 911, GIVE THE ADDRESS OF THE BUSINESS AND STATE THAT THE LOCATION IS A CANNABIS FACILITY, GIVE YOUR NAME AND TELEPHONE NUMBER, AND STAY ON THE PHONE UNTIL THE DISPATCHER ENDS THE CALL.
- IF THE FIRE IS SMALL, A PERSON ON TEAM WHO IS COMFORTABLE WITH THE USE OF A FIRE EXTINGUISHER MAY TRY TO PUT IT OUT.
- NEVER FIGHT A FIRE ALONE. NEVER ALLOW THE FIRE TO GET BETWEEN YOU AND YOUR EXIT - ALWAYS MAINTAIN AN ESCAPE ROUTE.
- THE FACILITIES MANAGER OR HIS/HER DESIGNEE WILL MONITOR THE DESIGNATED ASSEMBLY LOCATION AND NOTIFY EMERGENCY RESPONDERS IF SOMEONE HAS NOT ARRIVED AT THE EVACUATION ASSEMBLY LOCATION. ADDITIONAL PROCEDURES RELATED TO ASSEMBLY AREAS ARE DESCRIBED IN THE HEALTH AND SAFETY PLAN.

#### CHEMICAL SPILLS

- EMPLOYEES RECEIVE TRAINING ON HOW TO READ SAFETY DATA SHEETS (SDSS), THE TYPES AND LOCATIONS OF CLEANUP EQUIPMENT, AND WHERE AN EMPLOYEE SHOULD BE TAKEN FOR MEDICAL ATTENTION IN A NON-EMERGENCY SITUATION.
- ADDITIONAL COPIES OF SDSS ARE FILED IN A MAIN OFFICE IN CASE ACCESS TO THE INFORMATION IS PREVENTED DUE TO A SPILL.
- MANAGEMENT WILL POST THE PHONE NUMBER FOR THE POISON CONTROL HOTLINE IN ALL AREAS WHERE CHEMICALS ARE USED.
- CHEMICAL SPILLS ARE DIVIDED INTO INCIDENTAL SPILLS AND NON-INCIDENTAL SPILLS. AN INCIDENTAL SPILL DOES NOT CAUSE A HEALTH OR SAFETY HAZARD TO EMPLOYEES OR THE ENVIRONMENT. A NON-INCIDENTAL SPILL REQUIRES A RESPONSE EFFORT FROM TRAINED TEAM BROUGHT IN FROM OUTSIDE THE COMPANY. ALL CHEMICALS THAT WOULD REQUIRE THIS HIGHER LEVEL OF RESPONSE ARE CLEARLY MARKED.

19. Submit the cannabis PROCESSING facility's most up-to-date security plan. Security plans shall include:

- a) description of security alarm system
- b) person(s) notified of potential security breaches and alerts - [REDACTED]
- c) Video Storage Device location: local or cloud storage
- d) Procedures to provide UDAF inspectors immediate access to current and archived video footage when requested -
- e) any additional security measure in place that exceed the security requirements outlined in R68-28-6



THIS LEP SECURITY PLAN DESCRIBES THE POLICIES, PROCEDURES, ENGINEERING AND PHYSICAL CONTROLS, AND OTHER MEASURES THAT ARE IMPLEMENTED TO ENSURE A SAFE AND SECURE ENVIRONMENT FOR EMPLOYEES, CUSTOMERS, AND THE COMMUNITY, AS WELL AS TO COMPLY WITH LOCAL AND STATE SECURITY REQUIREMENTS.

DIVERSION PREVENTION INCLUDES FACILITIES SECURITY, ACCESS CONTROL, AND INVENTORY CONTROL.

A PRIMARY GOAL IS TO PREVENT UNAUTHORIZED ENTRY TO THE PREMISES, DETER THEFT, BURGLARY AND DIVERSION OF CANNABIS PRODUCTS OR OTHER VALUABLES AND PREVENT ACCESS TO THESE PRODUCTS BY INDIVIDUALS UNDER 21 YEARS OF AGE. STATE AND LOCAL LAWS SUPERSEDE ANY ITEM IN THE PLAN THAT DOES NOT MEET REGULATORY REQUIREMENTS.

WITHIN THIS PLAN THC- OR CBD- AND OTHER COMPOUNDS FOUND IN THE CANNABIS PLANT OR PART OF PLANT IN ANY FORM, CONTAINING MATERIAL IS REFERRED TO AS "THE PRODUCT."

WHERE AN "EMPLOYEE" IS REFERRED TO IN THIS PLAN, IT ALSO INCLUDES OTHER INDIVIDUALS INVOLVED WITH LEP, INCLUDING OWNERS, OFFICERS, AGENTS, AND OTHERS REPRESENTING THE COMPANY.

#### EMPLOYEE INVOLVEMENT

TEAMS ARE ASKED TO REVIEW SECURITY PROCEDURES RELATED TO THEIR SPECIFIC TASKS AT LEAST ONCE PER YEAR AND GIVE RECOMMENDATIONS FOR IMPROVEMENTS.

#### SECURITY ALARM SYSTEM

LEP HAS 2GIG ALARM SYSTEM. THE MODEL OF THE PANEL IS XXXXX.

IN THE EVENT OF AN ALARM, THE SECURITY ALARM WILL SEND A SIGNAL TO THE CENTRAL MONITORING STATION WHO WILL CALL THE PREMISE AND OUR RESPONSIBLE PARTY LIST TO VERIFY IF THE ALARM IS FALSE OR ACTUAL. JUSTIN ARRIOLA, [REDACTED] ARE THE RESPONSIBLE PARTIES LISTED FOR VERIFICATION. UPON VERIFICATION OF AN ACTUAL ALARM, OR IF THE RESPONSIBLE PARTIES ARE UNABLE TO BE REACHED, DISPATCHERS WILL CONTACT LOCAL LAW ENFORCEMENT FROM OREM, UTAH TO RESPOND TO THE ALARM.

IN THE EVENT OF A FIRE ALARM, THE SECURITY SYSTEM WILL SEND A SIGNAL TO THE CENTRAL MONITORING STATION AND THE LOCAL FIRE DEPARTMENT FROM OREM, UTAH WILL BE DISPATCHED TO THE FACILITY.

IF THERE IS NO SAFETY RISK TO STAYING ON THE PREMISES AND EMERGENCY RESPONDERS DO NOT DIRECT OTHERWISE, EMPLOYEES WILL IMMEDIATELY MONITOR ENTRANCES AND EXITS TO PREVENT UNAUTHORIZED ACCESS, AND MONITOR PRODUCTS THAT ARE ACCESSIBLE TO CUSTOMERS, CONTRACTORS, OR VISITORS.

IN THE EVENT OF A NON-EMERGENCY EVACUATION ALL MATERIAL AND FINISHED PRODUCT WILL BE SECURED PRIOR TO LEAVING THE FACILITY

#### ARMED ROBBERY

SHOULD AN ARMED ROBBERY INCIDENT OCCUR, OUR TEAM IS ADVISED TO FOLLOW RECOMMENDATIONS THAT ARE COMMONLY SUGGESTED BY LAW ENFORCEMENT ENTITIES (UTAH COUNTY SHERIFF) (OREM POLICE DEPARTMENT), INCLUDING THE FOLLOWING:

#### BURGLARY

IF EVIDENCE OF A BURGLARY IS DISCOVERED, TEAM WILL:

- AVOID ENTERING AREAS THAT HAVE NOT YET BEEN SEARCHED.
- NOTIFY LAW ENFORCEMENT USING A NON-EMERGENCY NUMBER.
- NOTIFY A SENIOR TEAM MEMBER IMMEDIATELY.
- PREVENT OTHERS FROM ENTERING THE AREA OR TOUCHING ANYTHING.
- UPON ARRIVAL OF THE POLICE, THE SENIOR TEAM MEMBER SHOULD INTRODUCE HIM/HERSELF, CHECK THE RESPONDER'S ID IF THERE IS ANY REASON TO BE SUSPICIOUS, AND INFORM THEM THAT A HIGHER-LEVEL MANAGER IS ON THE WAY (IF APPLICABLE).

#### MEDICAL EMERGENCIES

IN A MEDICAL CRISIS, EMPLOYEES ARE ADVISED TO FOLLOW PROCEDURES LEARNED DURING CPR/FIRST AID TRAINING. AT LEAST ONE PERSON WITH UP-TO-DATE TRAINING ARE ON TEAM AT ALL TIMES. AS PART OF THE LEP CONTINUING EDUCATION PROCESS, ALL MID- LEVEL EMPLOYEES OR EMPLOYEES WHO HAVE BEEN WITH LEP ARE TRAINED IN CPR FIRST AID AND OTHER PERTINENT FIRST AID TRAINING.

## FACILITIES SECURITY

EXTERIOR PEDESTRIAN DOOR AND INTERNAL DOOR FROM ENTRANCE AREA LEADING TO LAB FACILITIES WILL REQUIRE CARD ACCESS SYSTEM TO GAIN ENTRY. ONLY AUTHORIZED EMPLOYEES WILL HAVE CARD ACCESS TO ENTER THE LAB.

## PREMISES INGRESS AND EGRESS

- EMPLOYEES WILL HAVE KEYS AND SECURITY ALARM CODES TO OPEN THE BUILDING AND TURN OFF SECURITY ALARMS.
- THE FRONT DOOR TO THE PREMISES WILL SERVE AS THE ONLY ENTRANCE FOR ALL TEAM AND VISITORS.
- THE ENTRANCE AREA ARE COVERED BY SECURITY CAMERAS FACING MULTIPLE DIRECTIONS.
- PEDESTRIAN DOORS ARE LOCKED SUCH THAT OCCUPANTS CAN LEAVE THE BUILDING BUT NOT ENTER.
- ALL DOORS ARE ALARMED, COVERED BY SECURITY CAMERAS, AND WELL LIT.
- WINDOW WILL NOT OPEN, AND ROOM WITH WINDOW ARE ARMED WITH A GLASS DETECTION ALARM THAT WILL ALARM WHEN SOUND OF BREAKING GLASS IS DETECTED.

## PRODUCT VISIBILITY

- WINDOWS AND GLASS DOORS ARE COVERED WITH A MATERIAL THAT PREVENTS THOSE OUTSIDE THE BUILDING FROM SEEING PRODUCTS INSIDE.
- STORAGE AREAS AND LOCATIONS WHERE EMPLOYEES ARE WORKING WITH THE PRODUCT WILL NOT BE VISIBLE TO THE PUBLIC.
- ONLY A MINIMUM NECESSARY AMOUNT OF EACH PRODUCT ARE ON DISPLAY IN AREAS OPEN TO THE PUBLIC.

BUILDING DIAGRAM OF LOCATIONS HAVING ALARM SYSTEMS, SECURITY CAMERAS, AND LIGHTING.

## LIGHTING DESCRIPTION: INTERIOR

- INDOOR LIGHTING ARE PROVIDED BY BOTH FLUORESCENT AND INCANDESCENT OVERHEAD BULBS.
- LIGHTING INSIDE THE BUILDING ARE SUFFICIENT IN ALL AREAS SUCH THAT SECURITY CAMERAS ARE ABLE TO RECORD THE COMPLETE FACIAL FEATURES OF THOSE IN THE FACILITY.
- BURNED OUT BULBS ARE REPLACED WITHIN 24 HOURS AND RECORDED IN A FACILITY MAINTENANCE LOG.

## LIGHTING DESCRIPTION: EXTERIOR

- OUTSIDE LIGHTS WILL COME ON BEFORE SUNSET, AND THE LIGHT ARE DIRECTED DOWNWARD BY A SHADE.
- LIGHTS ON THE EXTERIOR OF THE BUILDING AND PERIMETER FENCE WILL USE A MINIMUM OF A 250 WATTS/125 VOLT INCANDESCENT BULB.
- EXTERIOR LIGHTING ON THE BUILDING IS TO BE CHECKED EVERY EVENING, AND ANY BURNED OUT BULBS THAT CAN BE REACHED WITH A LADDER WILL REPLACED BEFORE CLOSING. LIGHTS THAT REQUIRE ADDITIONAL EQUIPMENT TO REACH THE APPARATUS ARE CHANGED AS SOON AS THE NECESSARY EQUIPMENT CAN BE ACQUIRED.
- ANY LIGHTS THAT HAVE SHIFTED POSITION AND NO LONGER ADEQUATELY ILLUMINATE THE EXPECTED AREA ARE ADJUSTED WITHIN 24 HOURS IF EASILY ACCESSIBLE OR AS SOON AS NECESSARY EQUIPMENT CAN BE ACQUIRED.

## DIGITAL VIDEO SURVEILLANCE PLAN

LEP HAS A DIGITAL VIDEO SURVEILLANCE AND RECORDING SYSTEM THAT STORES FOOTAGE ON A LOCAL NVR. THE FOLLOWING AREAS ARE UNDER SURVEILLANCE:

- THE FRONT AND REAR OF THE PREMISES.
- PARKING AREAS.
- THE ENTRANCE AREA, SUCH THAT ALL PEOPLE WHO ENTER THE BUILDING ARE CLEARLY RECORDED.
- ALL LOCATIONS WHERE WHOLESALE SALES OCCUR.
- ALL LOCATIONS WHERE PRODUCTS ARE ON DISPLAY OR ARE STORED.
- ALL LOCATIONS WHERE INDIVIDUALS INTERACT WITH THE PRODUCT, INCLUDING SHIPPING AND RECEIVING AREAS.
- AREAS SUCH THAT INDIVIDUALS WHO ARE OPENING SAFES OR VAULTS CAN BE CLEARLY VIEWED.
- AREAS USED FOR THE DESTRUCTION OF PRODUCTS.
- ALL OTHER ROOMS THAT REQUIRE A HIGHER LEVEL OF ACCESS TO ENTER.

## RECORDING PROTOCOL

- VIDEO OF EXTERIOR LOCATIONS ARE RECORDED 24 HOURS A DAY.
- LIVE FEEDS OF THE VIDEO BEING RECORDED ARE ON SCREEN AT THE SECURITY DESK.
- INTERIOR LOCATIONS ARE 24 HOURS A DAY.

- INDUSTRY STANDARDS ARE FOLLOWED TO ENSURE THE INTEGRITY AND AUTHENTICITY OF VIDEO RECORDINGS TO THE LEVEL THAT THEY COULD BE ACCEPTED AS EVIDENCE IN A COURT OF LAW.
- COMPUTER ACCESS TO THE RECORDING SYSTEM ARE PASSWORD PROTECTED.
- RECORDINGS ARE BACKED UP BEFORE EARLIER RECORDED MATERIAL IS OVERWRITTEN BY THE SYSTEM.
- BACKED-UP RECORDINGS ARE STORED FOR 45 DAYS.
  - VIDEO FOOTAGE CAN BE ACCESSED BY THE OFFICE MANAGER OR CONTACTING JUSTIN ARRIOLA. A TIME CAN BE COORDINATED WITH JUSTIN BY EMAILING HIM AT ADDRESS ON FILE OR BY CALLING OUR OFFICE.

#### CLOSING PROCEDURE

LEP HAS CREATED A CLOSING PROCEDURE CHECKLIST THAT INCLUDES THE FOLLOWING TASKS AT A MINIMUM. ENSURE THAT:

- NO ONE REMAINS IN THE BUILDING.
- COMPUTERS ARE SHUT DOWN OR HAVE A LOCK SCREEN ON.
- ALL DOORS, GATES, SAFES, VAULTS AND OTHER LOCKABLE AREAS ARE SECURE.
- SURVEILLANCE CAMERAS AND RECORDING DEVICES ARE ON AND OPERATIONAL.
- EXTERIOR LIGHTING IS ON.
- NO SUSPICIOUS VEHICLES OR INDIVIDUALS ARE IN THE VICINITY
- ACCESS CONTROL

LEP WILL IMPLEMENT THE FOLLOWING POLICIES TO PREVENT ACCESS OF PRODUCTS TO MINORS, THE UNREGULATED MARKET, OR OTHERS INTENDING TO ACQUIRE THE PRODUCT THROUGH ILLEGAL MEANS.

ACTIONS INCLUDE VETTING NEW EMPLOYEES, BADGING, CAREFULLY CONTROLLED ACCESS METHODS, SECURED STORAGE AND PROCESSING AREAS, AND FOLLOWING SECURED WASTE MANAGEMENT PROCEDURES.

#### EMPLOYEE ACCESS LEVELS

EACH EMPLOYEE ARE ASSIGNED A LEVEL OF ACCESS. THE LEVEL OF ACCESS WILL DETERMINE WHICH SECTIONS OF THE FACILITY THE EMPLOYEE HAS PERMISSION TO ENTER, ACCESS TO SAFES OR VAULTS, AND WHICH FOLDERS OR FILES CAN BE ACCESSED WITHIN THE COMPUTER SYSTEM.

#### EMPLOYEE IDENTIFICATION

ALL EMPLOYEES OR OTHERS OPERATING ON BEHALF OF THE COMPANY WILL DISPLAY A LAMINATED BADGE ISSUED BY THE COMPANY AT ALL TIMES ON THE BUSINESS PREMISES OR WHILE REPRESENTING THE COMPANY AT OFF-SITE LOCATIONS.

#### KEY ISSUANCE PROCEDURE

- THE OFFICE MANAGER WILL RECORD THE ISSUANCE OF KEYS OR ACCESS CARDS TO A NEW EMPLOYEE INTO A SECURITY ACCESS LOG.
- THE SECURITY ACCESS LOG WILL INCLUDE THE NAME OF THE PERSON BEING ISSUED THE ITEM, THE EMPLOYEE'S COMPANY-ASSIGNED IDENTIFICATION NUMBER, THE EMPLOYEE'S POSITION/TITLE, THE LEVEL OF ACCESS BEING ASSIGNED, DATE, SIGNATURE OF EMPLOYEE, AND THE INITIALS OF THE ISSUER. IF THE ACCESS PERMISSIONS ARE NOT BASED ON AN ACCESS LEVEL DESCRIBED ABOVE; THE LOG WILL NOTE EACH LOCATION THE EMPLOYEE ARE ABLE TO ENTER.
- ALL EMPLOYEES ISSUED A KEY OR ACCESS CARD WILL SIGN A KEY/KEY CARD USER AGREEMENT ATTESTING TO THEIR UNDERSTANDING RELATED PROCEDURES.
- THE PAPER VERSION OF THE SECURITY ACCESS LOG ARE STORED IN A LOCKED LOCATION WHEN NOT IN USE.

#### ACCESS CODES

- FOR LOCATIONS CONTROLLED BY MEANS OF ENTERING AN ACCESS CODE INTO A KEYPAD, EACH INDIVIDUAL WILL HAVE A SEPARATE ACCESS CODE, BOTH TO TRACK WHO IS ACCESSING THE CONTROLLED AREA, AND TO ALLOW A SINGLE CODE TO BE TERMINATED RATHER THAN REKEYING THE ENTIRE SYSTEM AFTER THE EMPLOYEE'S LAST DAY.
- THE ISSUANCE OF AN ACCESS CODE ARE RECORDED IN THE SECURITY ACCESS LOG, INCLUDING A LIST OR DESIGNATION WHICH INDICATES THE LOCATIONS THE EMPLOYEE IS ABLE TO ACCESS.

#### KEY RETURN AND ACCESS TERMINATION PROCEDURE

- UPON LEARNING OF AN EMPLOYEE'S FINAL EMPLOYMENT DATE, AN AUTHORIZED SENIOR TEAM MEMBER WILL NOTIFY ALL TEAM INVOLVED IN MAINTAINING THE SECURITY SYSTEM.

- A CHECKLIST ARE GENERATED WITH A LIST OF ACCESS SYSTEM ITEMS RELATED TO THE EMPLOYEE THAT NEED TO BE RETURNED OR CANCELLED. AS EACH ITEM IS RETURNED OR CANCELLED, THE AUTHORIZED PERSON WILL CHECK THE ITEM OFF AND INITIAL THE FORM.
- THE EMPLOYEE SHALL RETURN KEYS TO ADMINISTRATION BEFORE LEAVING FROM WORK THE FINAL DAY. IN THE EVENT KEYS ARE NOT RETURNED, DOORS WILL BE REKEYED.
- IN THE EVENT UPON TERMINATION, ACCESS CARDS AND SECURITY CODES WILL BE TERMINATED FROM THE SYSTEM WITHIN 24 HRS.

#### LOCKS/CABINETS/SAFES/VAULTS

OUR SAFE IS COMMERCIAL GRADE, MADE OF METAL, AND LARGE ENOUGH TO STORE ALL ITEMS OR PRODUCTS ANTICIPATED ON THE PREMISES IN EACH SECURED LOCATION. THE SAFE ARE SECURELY ANCHORED TO A PERMANENT PART OF THE BUILDING. 20 FT CONTAINER LOCK BOXES WILL BE USED TO SECURELY STORE BIO AND FINISHED PRODUCT WE WILL BE STACKING TWO BOXES ONE ON TOP OF THE OTHER. THIS WILL ALLOW US TO SEPARATE BIO FROM FINISHED GOODS.

#### NON-EMPLOYEE ACCESS

- ANY NON-EMPLOYEE WHO WILL HAVE ACCESS TO LIMITED-ACCESS AREAS ARE REQUIRED TO SHOW ID, LOG-IN, AND BE ESCORTED BY AN AUTHORIZED EMPLOYEE.
- A NON-EMPLOYEE ACCESS LOG WILL INCLUDE THE PERSON'S NAME, COMPANY, DATE, TIMES THE INDIVIDUAL ENTERED AND EXITED, AND REASON FOR VISIT.
- NON-EMPLOYEES WILL NOT HAVE ACCESS TO PRODUCTS OR PRODUCT STORAGE AREAS UNLESS THE PERSON'S WORK MUST TAKE PLACE IN THAT AREA.
- LEP WILL NOT RECEIVE CONSIDERATION OR COMPENSATION FOR PERMITTING AN INDIVIDUAL TO ENTER THE LIMITED- ACCESS AREAS.
- ENTRANCES TO ALL LIMITED-ACCESS AREAS SHALL HAVE A SOLID DOOR AND A LOCK THAT MEETS REGULATORY REQUIREMENTS. THE DOOR WILL REMAIN CLOSED WHEN NOT IN USE DURING REGULAR BUSINESS HOURS.

#### OPERATIONAL AND TECHNICAL CONTROLS

- NETWORK AND COMPUTER PASSWORDS ARE COMPOSED OF A COMBINATION OF UPPER- AND LOWER-CASE LETTERS, NUMBERS, AND AT LEAST ONE ADDITIONAL CHARACTER.
- USER CREDENTIALS ARE ENCRYPTED OR OTHERWISE SECURED TO PROTECT AGAINST PASSWORD COMPROMISES.
- SENSITIVE BUSINESS FILES ARE ENCRYPTED AND OTHERWISE PROTECTED WHENEVER THERE IS A NEED TO TRANSFER THEM ELECTRONICALLY OUTSIDE THE INTERNAL COMPUTER NETWORK.
- SENSITIVE DATA STORED ON REMOVABLE MEDIA, INCLUDING, BUT NOT LIMITED TO, LAPTOPS, SMART PHONES, FLASH DRIVES, AND CD/DVDS, MUST BE ENCRYPTED BEFORE THE ITEM IS TAKEN BEYOND THE PHYSICAL CONTROLS OF THE PREMISES.
- FIREWALLS AND INTRUSION DETECTION SYSTEMS ARE IMPLEMENTED TO CONTROL ACCESS TO THE NETWORK. THESE CONFIGURATIONS ARE SUBJECT TO PERIODIC TESTING AND AUDITS.
- ACCESS LOGS ARE MONITORED ON A DAILY BASIS OR A NOTIFICATION SYSTEM IS USED TO IDENTIFY UNAUTHORIZED ATTEMPTS TO ACCESS THE COMPUTING SYSTEM AND ALERT THE COMPUTING SECURITY MANAGER AND OTHER RELEVANT EMPLOYEES.
- SENSITIVE BUSINESS FILES ARE MAINTAINED IN A SEPARATELY SECURED SERVER LOCATION FROM FILES USED ON A DAILY BASIS BY REGULAR EMPLOYEES.
- IF REMOTE ACCESS TO THE VIDEO SURVEILLANCE SYSTEM OR OTHER FILES IS ALLOWED, THE NETWORK HAS APPROPRIATE ENDPOINT SECURITY, AND THE ACCESSIBLE FILES ARE MAINTAINED IN A SEPARATELY SECURED SERVER LOCATION FROM OTHER FILES.
- ANTIVIRUS AND OTHER SOFTWARE ARE UPDATED ON A REGULAR BASIS TO ENSURE THE INTEGRITY OF THE COMPUTING SECURITY SYSTEM.

#### PHYSICAL CONTROLS

- ALL COMPUTERS ARE SCREEN LOCKED WHENEVER AN EMPLOYEE LEAVES THE UNIT FOR A PERIOD OF TIME THAT COULD ALLOW UNAUTHORIZED ACCESS.
- PRIMARY NETWORK AND COMPUTING HARDWARE ARE STORED IN A SECURED ROOM WITH LIMITED ACCESS.
- ANY PAPER LOGS RELATED TO COMPUTING RESOURCE ACCESS ARE STORED IN LOCKED DRAWERS OR CABINETS. ELECTRONIC FILE STORAGE AND ARCHIVING

- LEP HAS A PROTOCOL TO ENSURE THE INTEGRITY AND AUTHENTICITY OF THE STORED DATA TO THE LEVEL THAT THEY COULD BE ACCEPTED AS EVIDENCE IN A COURT OF LAW.
- BACKUP COPIES OF ARCHIVED MATERIAL ARE ENCRYPTED, OR PASSWORD PROTECTED AND STORED IN A SECURED CLOUD ENVIRONMENT, OR, IF ON REMOVABLE MEDIA, OFF-SITE IN A VAULT OR SAFE WHERE IT IS EASY TO ACCESS AND EASILY REPRODUCIBLE.

20. Provide the facility's storage protocols, both short and long-term, to ensure all cannabis is stored in a manner that is sanitary and preserves the integrity of the cannabis in accordance to R68-28-9.

#### STORAGE OF CANNABIS PRODUCTS

- LEP IS RESPONSIBLE FOR STORING PRODUCTS UNTIL ALL THE DISTRIBUTION FUNCTIONS ARE COMPLETE, INCLUDING LABORATORY TESTING OF SAMPLES, REPACKAGING, AND TRANSPORTATION FROM THE PREMISES.
- PRODUCTS DISTRIBUTED BY LEP ARE STORED INSIDE LOCKED CABINETS AND/OR FIREPROOF SAFE UNLESS BEING PROCESSED THROUGH THE DISTRIBUTION SYSTEM.
- PRODUCTS MAY BE STORED IN A LOCKED FREEZER OR FRIDGE DURING THE MANUFACTURING PROCESS
- TEAM ENSURES THAT EACH BATCH OF A PRODUCT IS STORED SEPARATELY AND DISTINCTLY FROM OTHER BATCHES OF PRODUCTS ON THE PREMISES.
- TEAM ENSURES A LABEL WITH THE FOLLOWING INFORMATION IS PHYSICALLY ATTACHED TO THE CONTAINER OF EACH BATCH:
  - THE MANUFACTURER OR CULTIVATOR'S NAME AND LICENSE NUMBER
  - THE DATE OF ENTRY INTO THE DISTRIBUTOR'S STORAGE AREA
  - THE UNIQUE IDENTIFIERS AND BATCH NUMBER ASSOCIATED WITH THE BATCH
  - A DESCRIPTION OF THE PRODUCTS WITH ENOUGH DETAIL TO EASILY IDENTIFY THE BATCH
  - THE TYPE DESIGNATION (MEDICAL) FOR THE BATCH
  - THE WEIGHT OR QUANTITY OF UNITS IN THE BATCH
  - THE BEST-BY, SELL-BY, OR EXPIRATION DATE OF THE BATCH, IF ANY
- IF ANY PRODUCTS ARE REMOVED FROM THE STORAGE CABINETS, DESTROYED, OR TRANSFERRED FOR ANY REASON, THE REQUIRED INFORMATION RELATED TO THE TRANSFER OR DESTRUCTION OF GOODS ARE ENTERED INTO THE INVENTORY CONTROL SYSTEM.
- NO ONE MAY REMOVE PRODUCTS FROM THE SECURE STORAGE ROOM WITHOUT HAVING AN APPROVED OPERATIONAL REASON FOR DOING SO AND FOLLOWING THE INVENTORY CONTROL PROCEDURES.

Provide the medical cannabis processing facility's written plan and procedures to handle potential recalls in accordance to R68-28-14. Include:

- a) The name(s) of persons designated as recall coordinator (R68-28-14(2a))
- b) The contact information for how reach staff member(s)
- c) How will affected parties be notified
- d) A written procedure with specifics of what to do in case of a product recall.

IN THE EVENT THAT A PRODUCT IS FOUND TO BE CONTAMINATED, ALL PRODUCTS DERIVED FROM OR INCLUDED IN THE BATCH ARE RECALLED MINIMIZING RISK OF FURTHER ADVERSE EFFECTS. THE LAB DIRECTOR, IS DESIGNATED AS LEP'S RECALL COORDINATOR.

- [REDACTED]
- [REDACTED] WILL ASSEMBLE A LIST OF ANY BATCH THAT COULD BE CONTAMINATED.
- USING THE INVENTORY CONTROL SYSTEM, LEP WILL COMPILE RECORDS OF ALL PURCHASERS OF THE CONTAMINATED BATCH(ES).
- [REDACTED] WILL CONTACT ALL PURCHASERS BY PHONE AND INFORM THEM OF THE SERIOUS ADVERSE EVENT, RESULTING INVESTIGATION, AND PROVIDE INSTRUCTIONS FOR RETURNING ANY UNUSED PORTION OF THE RECALLED PRODUCT.
- LEP WILL HAVE A LIST OF ALL PURCHASERS THAT ARE USED TO AUTHENTICATE RETURNS OR CLAIMS FOR REIMBURSEMENT, WHICH ARE UPDATED UPON EACH REIMBURSEMENT TO ENSURE THERE ARE NO DUPLICATE CLAIMS.
- PURCHASERS OF A RECALLED PRODUCT WILL RECEIVE A CREDIT ISSUED ON THEIR ACCOUNT, NOT TO EXCEED THE ORIGINAL VALUE OF THE PURCHASE.
- LEP WILL MAKE ANY INFORMATION AVAILABLE THAT MAY AID OTHER PERMITTED BUSINESSES IN NOTIFYING OTHER RELEVANT ENTITIES.

- RECALLED MATERIAL IN THE FACILITIES' EXISTING INVENTORY WILL IMMEDIATELY BE PLACED INTO A SEALED CONTAINER LABELED WITH "RECALLED MATERIAL". ANY RETURNED PRODUCTS WILL ALSO BE PLACED IN THE SEGREGATED CONTAINER. THESE ITEMS ARE STORED IN A SECURED LOCATION UNTIL DISPOSAL.
- JUSTIN ARRIOLA WILL UPDATE THE INVENTORY CONTROL SYSTEM NOTING THE RECALLED STATUS OF EACH ITEM.
- ONCE DISPOSAL HAS BEEN APPROVED, LEP WILL DISPOSE OF RECALLED PRODUCTS WITHIN 24 HOURS IN ACCORDANCE WITH THE WASTE DISPOSAL SOP AND ALL APPLICABLE STATE AND LOCAL REGULATIONS.
- CONTAMINATED PRODUCTS WILL BE STORED IN A SEPARATE LOCKING CABINET AWAY FROM COMPLIANT PRODUCT.

21. Submit procedures on how the facility will dispose of Product that fails quality assurance testing. A destruction plan must be written for every product type produced at the processing facility and must be in compliance with federal and state laws laid out in Utah Code 4-41a-405 and Rule R68-27-15 Cannabis Waste Disposal.

LEP'S PROCEDURES FOR PRODUCT DISPOSAL IS AS FOLLOWS:

- EDIBLES – PRODUCT WILL BE MIXED WITH HOT WATER AND BLEACH AND REQUIRED TO SIT FOR 15 MINUTES. THE LIQUID WILL THEN BE MIXED WITH CAT LITTER OR FLOOR DRY AND DISPOSED IN THE TRASH.
- VAPE CARTS – PRODUCT WILL BE BROKEN IN HALF AND MIXED WITH BLEACH. IT WILL SIT FOR 15 MINUTES AND THEN MIXED WITH FLOOR DRY AND PUT INTO THE TRASH.
- TINCTURE – ALL LIQUID WILL BE POURED OUT OF CONTAINER AND MIXED WITH FLOOR DRY. IT WILL THEN BE PUT INTO THE TRASH ALONG WITH THE CONTAINERS.
- CONCENTRATES – PRODUCT IS DRAINED FROM PACKAGE AND MIXED WITH FLOOR DRY THEN PUT INTO THE TRASH ALONG WITH THE PACKAGING.
- BALMS – THE CONTAINERS WILL BE PUT INTO THE FACILITIES OVEN TO HEAT THE BALM TO A LIQUID. THE LIQUID WILL THEN BE POURED OUT FROM THE CONTAINERS AND MIXED WITH FLOOR DRY THEN PUT IN THE TRASH ALONG WITH THE CONTAINERS.

22. Detail the procedures the cannabis facility has employed to meet the transport and transfer requirements of Utah Administrative Rule R68-28-13, Transportation. Include the make and model of every vehicle the company will use to transport Cannabis Material.

LEP MAY RECEIVE PRODUCTS FOR DISTRIBUTION FROM OTHER LICENSEES, INCLUDING CULTIVATORS, MANUFACTURERS, AND DISTRIBUTORS (ARM'S LENGTH TRANSACTION). THIS MEANS WE MAY DELIVER FINAL END PRODUCT DIRECTLY TO PHARMACY AND NOT BACK TO THE CULTIVATOR.

- THE PRODUCTS WILL ARRIVE WITH A TRANSPORT MANIFEST PROVIDED BY DISTRIBUTOR
- CANNABIS GOODS WILL ENTER THE BUILDING DURING BUSINESS HOURS THROUGH THE DESIGNATED DELIVERY DOORWAY OR DOCK. THE DOOR REMAINS LOCKED UNTIL OPENED BY AUTHORIZED EMPLOYEE INSIDE THE FACILITY.
- AFTER THE PRODUCTS ARE SECURE INSIDE THE BUILDING, AN EMPLOYEE AUTHORIZED TO USE THE INVENTORY CONTROL SYSTEM WILL CONDUCT A CAREFUL CHECK OF ALL RECEIVED PRODUCTS, ENSURING THAT:
  - THE CONTENTS OF THE DELIVERY MATCH THE ITEMS REQUESTED ON THE PURCHASE ORDER AND REFLECTED ON THE TRANSPORT MANIFEST. ANY DISCREPANCY SHOULD BE RECORDED, REPORTED TO A MANAGER, AND CORRECTED ON THE TRANSPORT PERMIT / SHIPPING MANIFEST OR OTHER DOCUMENTS BEFORE THEY ARE SIGNED.
  - THE PRODUCTS ARE NOT DAMAGED OR SHOW ANY SIGNS OF TAMPERING. GOODS THAT ARE DAMAGED OR HAVE BEEN TAMPERED WITH SHOULD BE REJECTED. TEAM SHOULD RECORD THE INCIDENT, REPORT IT TO A MANAGER, AND ADJUST THE SHIPPING MANIFEST BEFORE SIGNING IT.
  - THE TRANSPORT MANIFEST CONTAINS THE STATE LICENSE NUMBERS OF ALL DISTRIBUTORS, CULTIVATORS, MANUFACTURERS, OR OTHER LICENSEES INVOLVED IN THE TRANSACTION.
- PRODUCTS ARE TRANSFERRED TO A SECURE STORAGE AREA AND STORED IN ACCORDANCE WITH THIS PROCEDURE.

#### TRANSPORTING PRODUCTS TO A PHARMACY

LEP WILL TRANSPORT PRODUCTS FOUND TO COMPLY TO A RETAILER ACCORDING TO THE FOLLOWING REQUIREMENTS:

- ALL VEHICLES TRANSPORTING PRODUCTS WILL HAVE A MOTOR CARRIER PERMIT PURSUANT TO R 68–27–8, TRANSPORTING OF CANNABIS PRODUCTS.
- PRODUCTS WILL ONLY BE TRANSPORTED INSIDE OF A VEHICLE OR TRAILER (HEREAFTER BOTH ARE REFERRED TO AS VEHICLES) AND WILL NOT BE VISIBLE FROM OUTSIDE OF THE VEHICLE. THE TRUNK IS INCLUDED IN THE DEFINITION OF THE INSIDE OF A VEHICLE.
- PRODUCTS WHEN POSSIBLE ARE LOCKED IN A BOX, CONTAINER, OR CAGE THAT IS SECURED TO THE INSIDE OF THE VEHICLE.

- WHILE LEFT UNATTENDED, VEHICLES ARE LOCKED AND SECURED.
- TRANSPORTATION TEAM WILL NOT LEAVE A VEHICLE CONTAINING PRODUCTS UNATTENDED IN A RESIDENTIAL AREA OR PARKED OVERNIGHT IN A RESIDENTIAL AREA.
- AT A MINIMUM, LEP WILL HAVE A VEHICLE ALARM SYSTEM ON ALL TRANSPORT VEHICLES.
- PACKAGES OR CONTAINERS HOLDING PRODUCTS WILL NOT BE TAMPERED WITH OR OPENED DURING TRANSPORT.
- TEAM TRANSPORTING PRODUCTS WILL ONLY TRAVEL BETWEEN LICENSEES AND THE PHARMACY LISTED ON THE TRANSPORT MANIFEST PREMISES WHEN ENGAGED IN THE TRANSPORTATION OF PRODUCTS. MORE THAN ONE LICENSEE MAY BE VISITED ON A SINGLE TRIP.
- NON-CANNABIS PRODUCTS WILL NOT BE TRANSPORTED WITH CANNABIS PRODUCTS, EXCEPT SPECIFIC ACCESSORIES ALLOWED BY LAW.
- EMPLOYEES WILL READILY COMPLY WITH REQUESTS FROM THE STATE REGULATING AUTHORITY TO INSPECT TRANSPORT VEHICLES EITHER ON THE PREMISES OR DURING TRANSPORT.
- THE FOLLOWING VEHICLES WILL BE USED TO TRANSPORT CANNABIS MATERIAL:



23. Submit proof of a \$50,000 performance bond issued by a surety business. ([see attached document](#))
24. Submit proof all scales used in the facility are certified, as outlined In Utah Administrative Rule 68-28-4 (8). Visit <https://ag.utah.gov/businesses/regulatory-services/weights-measures/> for more information. ([see attached doc](#))
25. Submit proof of registration as a Manufactured Food Establishment with UDAF's Regulatory Services. ([see attached doc](#))
26. Submit a current local business license or permit from the city/municipality ([see attached doc](#))
27. Submit the names of all agents currently working at the company's cultivation facility ([see attached doc](#))
28. Attach all approved Change Requests to the application.



Business License

 **VINEYARD**  
125 S MAIN STREET  
VINEYARD, UT 84059


**BUSINESS LICENSE**  
**#3534**  
EFFECTIVE 09/01/22 TO 08/31/23

The below named person or firm is hereby granted a license to do business as stated herein in Vineyard, Utah for the period indicated, subject to the provisions of the Vineyard Municipal Code, and applicable state or federal regulations.

BUSINESS OWNER: Justin Arriola

[Redacted]

[Redacted]

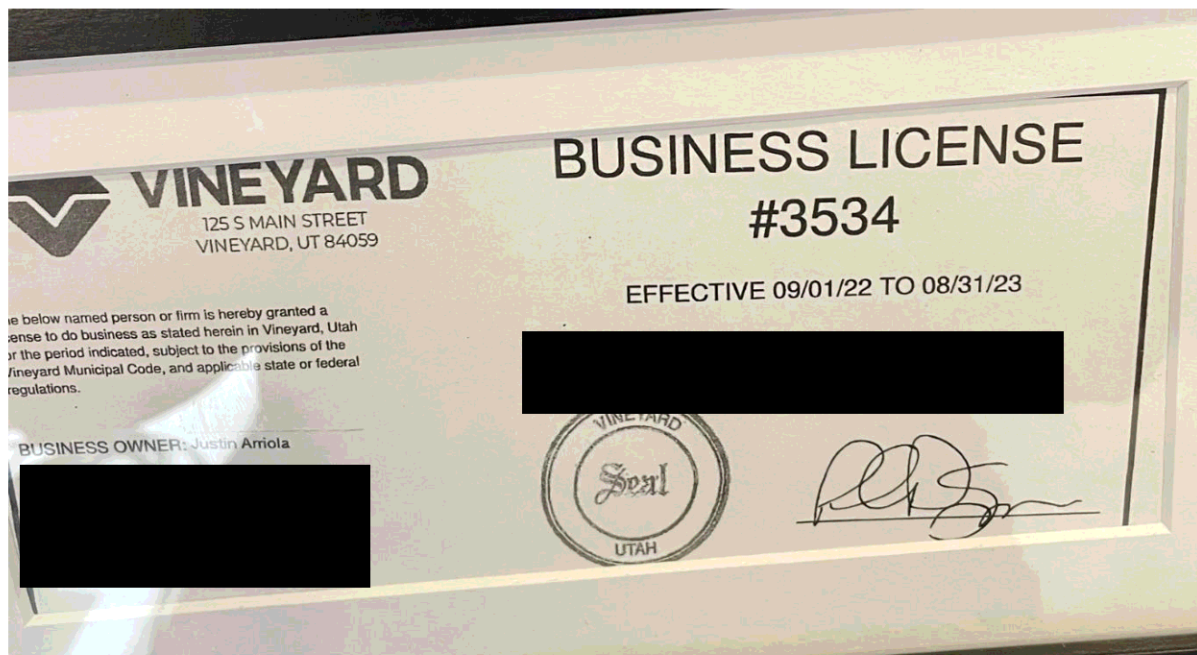
   
City Recorder

THIS LICENSE MUST BE POSTED IN A CONSPICUOUS PLACE - NON-TRANSFERABLE

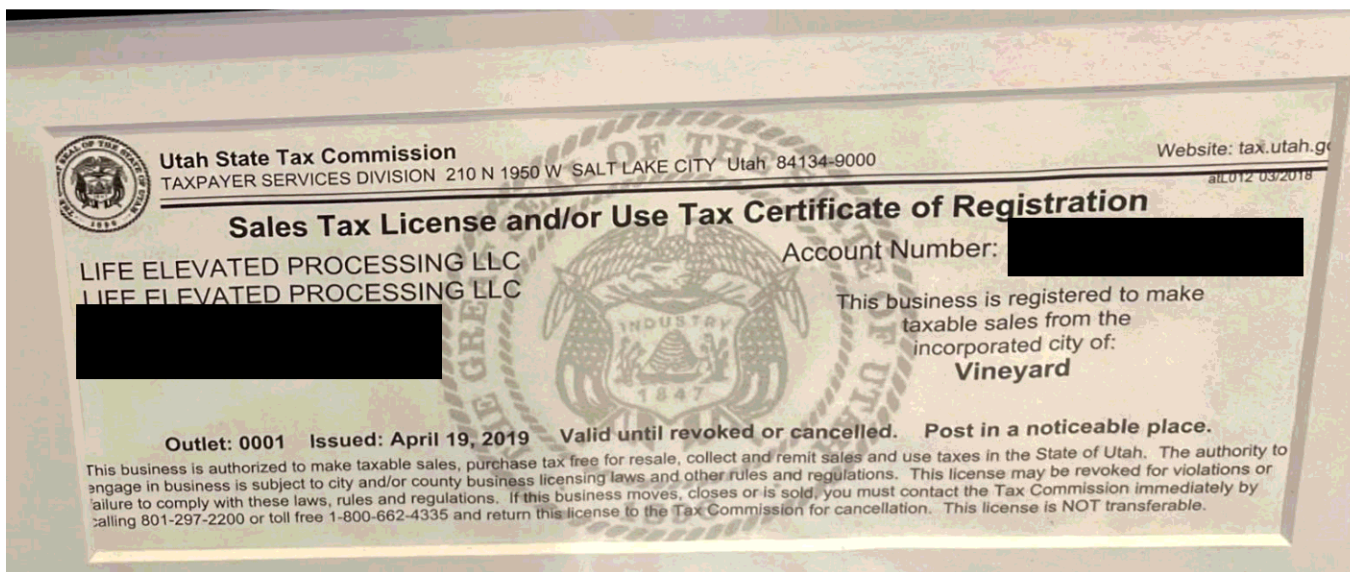
**BUSINESS LICENSE RECEIPT**  
**No. 3534**  
EFFECTIVE [Redacted]

[Redacted]

## Business License



## Sales Tax License

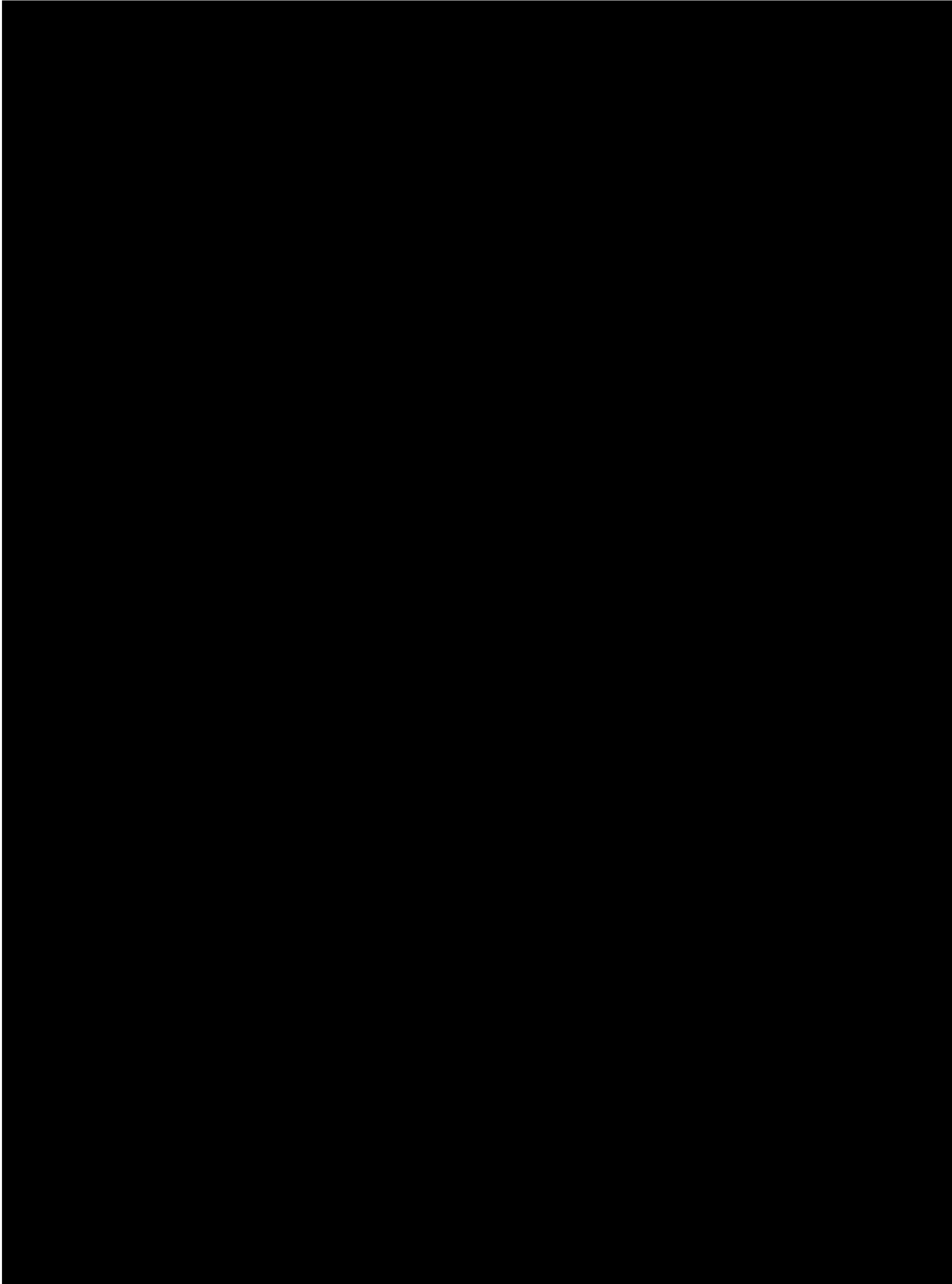


Food Establishment, Weights and Measures Certificate

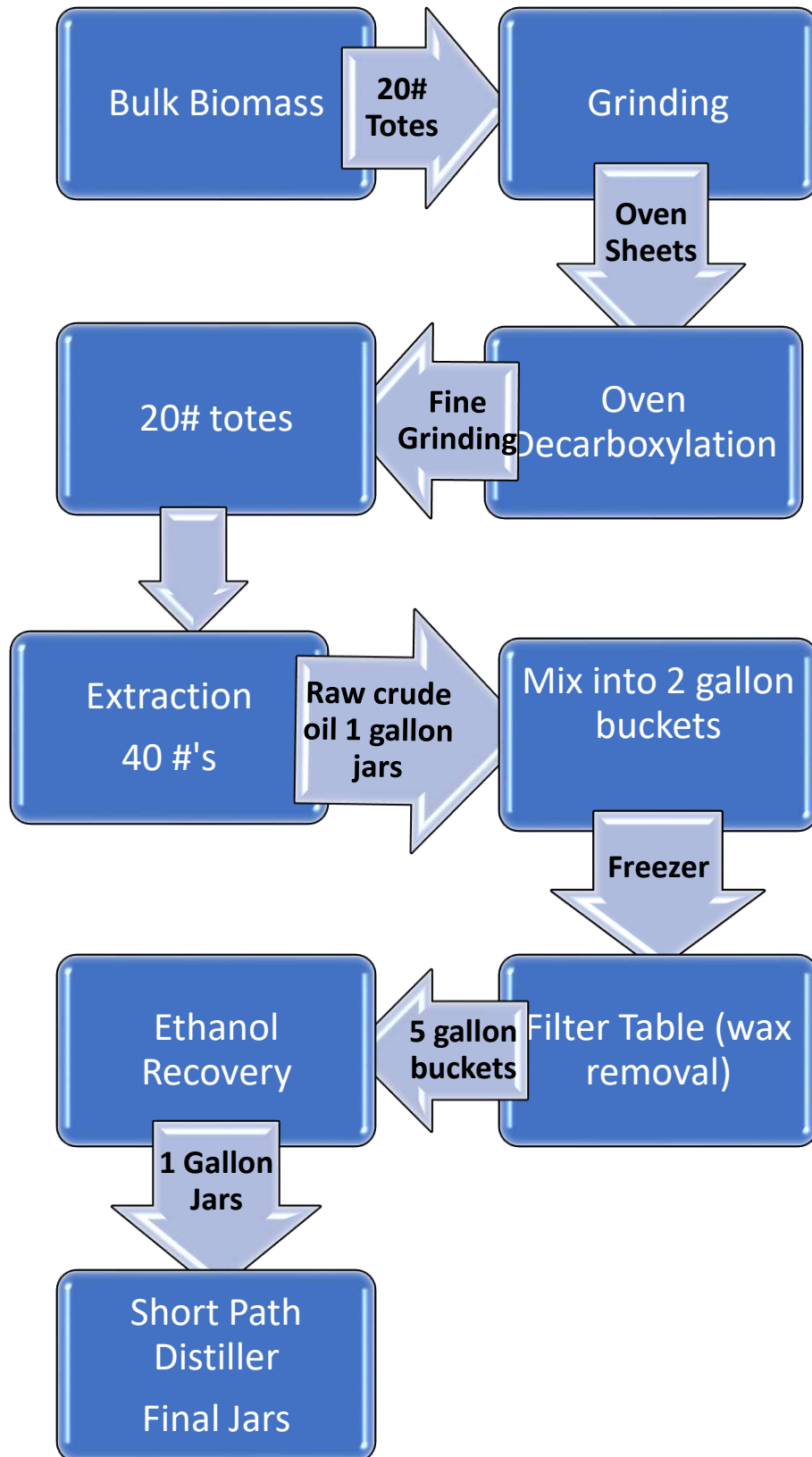


Medical Cannabis Processor Tier 1









### Life Elevated Processing Label Checklist

*This checklist is subject to change and **must** be filled out as a **QUALITY CHECK** for **EVERY LABEL AND PACKAGE PRINT**. This checklist must be verified before being sent to pharmacies.*

**Prior to shipments, a physical checklist must be completed and included with the invoices for pharmacies along with product education tools.**

**The cannabis fact panel for cannabis plant product shall include the following information in exact the order as listed:**

#### **R68-28-14. Labeling and Packaging of Cannabis and Cannabis Product.**

(1) Cannabis product labeling shall contain the following information:

(a) the medicinal dosage form identified on the product face along with the words "THC or Cannabis Infused":

(i) "gummies" may be used instead of "gelatinous cube";

(ii) "tincture" may be used instead of "sublingual preparation" or "liquid suspension"; and

(iii) a descriptive product name is allowed if the text is smaller than the dosage form and is no appealing to children;

(b) the name and license number of the cannabis processing facility;


(c) directions for consumers to contact the department with product complaints by going to [medicalcannabis.utah.gov/production](https://medicalcannabis.utah.gov/production);

(d) for products containing THC, a warning symbol provided by the department; and



(e) the amount of total THC contained in the package, in milligrams.

(2) Before January 1, 2024, cannabis product labeling shall contain the following warning: "WARNING: Cannabis has intoxicating effects and may be addictive. Do not operate a vehicle or machinery under its influence. KEEP OUT OF REACH OF



CHILDREN. This product is for medical use only. Use only as directed by a recommending medical provider."

(3) Starting on January 1, 2024, cannabis product labeling shall contain the following warning: "WARNING: Cannabis has intoxicating effects, may be addictive, and may increase risk of mental illness. Do not operate a vehicle or machinery under its influence. KEEP OUT OF REACH OF CHILDREN. This product is for medical use only. Use only as directed by a recommending medical provider."

(4) Starting on May 3, 2023, raw cannabis or a cannabis product sold in a vaporizer cartridge shall include a warning label that states:

(a) "WARNING: Vaping of cannabis-derived products has been associated with lung injury."; and

(b) "WARNING: Inhalation of cannabis smoke has been associated with lung injury."

(5) A cannabis processing facility may include a QR code on the cannabis product labeling that links to a COA from a licensed independent cannabis testing laboratory. The QR code may not link to any other information.

(6) Any information appearing on the cannabis product labeling shall be:

(a) displayed in any legible font, that is not a script or decorative font, provided that the lowercase letter "o" is at least one-sixteenth inch in height;

(b) displayed in a color that contrasts conspicuously with its background; and

(c) displayed in English, although a licensee may also choose to display required information in additional languages.

(7) A cannabis processing facility shall place a cannabis fact panel on a cannabis product before the sale of the cannabis product to a medical cannabis pharmacy.


(8) The cannabis fact panel shall be printed in black and white.

(9) The cannabis fact panel shall be securely affixed to the package.

**(10) The cannabis fact panel for cannabis plant product shall include the following information, from top to bottom, in the order as listed:**

- ☐ (a) the name of the cannabis cultivation facility;
- ☐ (b) the lot number;
- ☐ (c) the date of harvest;
- ☐ (d) the date of final testing;
- ☐ (e) the batch number;
- ☐ (f) the date on which the product was packaged;



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- ☐ (g) the quantity of any cannabinoid listed as present on the COA that is greater than 1% of total cannabinoids;
  - ☐ (h) the expiration date; and
  - ☐ (i) the net weight displayed in grams.
  - ☐ (11) THC potency levels for cannabis flower shall be listed as total THC in milligrams per gram.
  - ☐ (12) The cannabis fact panel for cannabis derivative product shall include the following information, from top to
    - ☐ bottom, in the order listed:
    - ☐ (a) the batch number;
    - ☐ (b) the date of the final testing;
    - ☐ (c) the date on which the product was packaged;
    - ☐ (d) the quantity of any cannabinoid listed as present on the COA that is greater than 1% of total cannabinoids;
    - ☐ (e) the expiration date;
    - ☐ (f) the total amount of THC measured in milligrams per gram;
    - ☐ (g) a list of each ingredient and each major food allergen as identified in 21 U.S.C. 343;
    - ☐ (h) the identity of any artificially derived cannabinoid present in the product;
    - ☐ (i) the net weight of the product displayed in grams or milliliters and number of pieces, if applicable; and
    - ☐ (j) a disclosure of the type of extraction process used and any solvent, gas, or other chemical used in the extraction process.

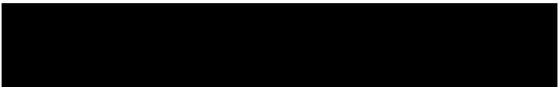
(13) The label of a cannabis derivative product may include a flavor name if it is not candy-like or a name the facility knows or should know appeals to children.

(14) The label of a cannabis product that contains an artificially derived cannabinoid shall clearly display the following text : "This product contains artificially derived cannabinoids."

(15) Any terpene listed on a cannabis product package shall be verified as present by a licensed independent cannabis testing laboratory and have its quantity listed on the fact panel.

(16) A cannabis processing facility may include a logo and product brand name on the cannabis product face that is exempt from the requirements of Subsection R68-28-13(3) and that:

- (a) does not exceed 20% of the product face;
- (b) does not obscure the information required on the label; and
- (c) does not include:



(i) unprofessional terms, slang, phrasing, or verbiage associated with the recreational use of cannabis;

(ii) any image bearing resemblance to a cartoon character or fictional character whose target audience is children or

minors;

(iii) content, symbol, or imagery that the cannabis processing facility knows or should know appeals to children;

(iv) imagery featuring a person using the product in any way;

(v) any recreationally oriented subject; or

(vi) any statement, design, or representation, picture, or illustration that is obscene or indecent.

(17) No other information, illustration, or depiction with the exception of directions for use shall appear on the

labeling.

(18) Shapes on cannabis product packaging or labeling shall not resemble the product or real-world items.

(19) After January 1, 2023, cannabis product packaging, logos, and brand names shall be pre-approved by the Department.

**Notes/Comments:**

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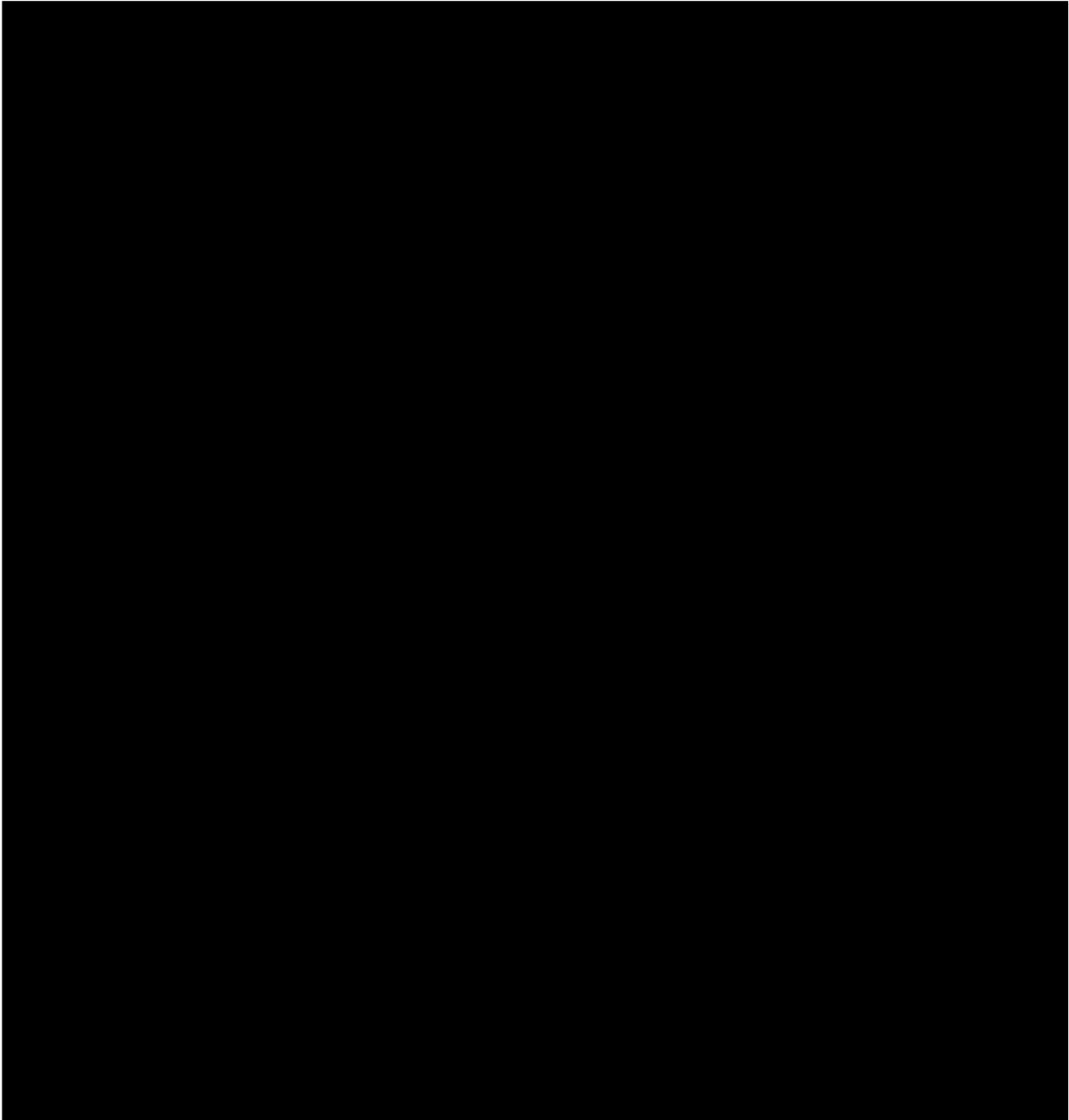
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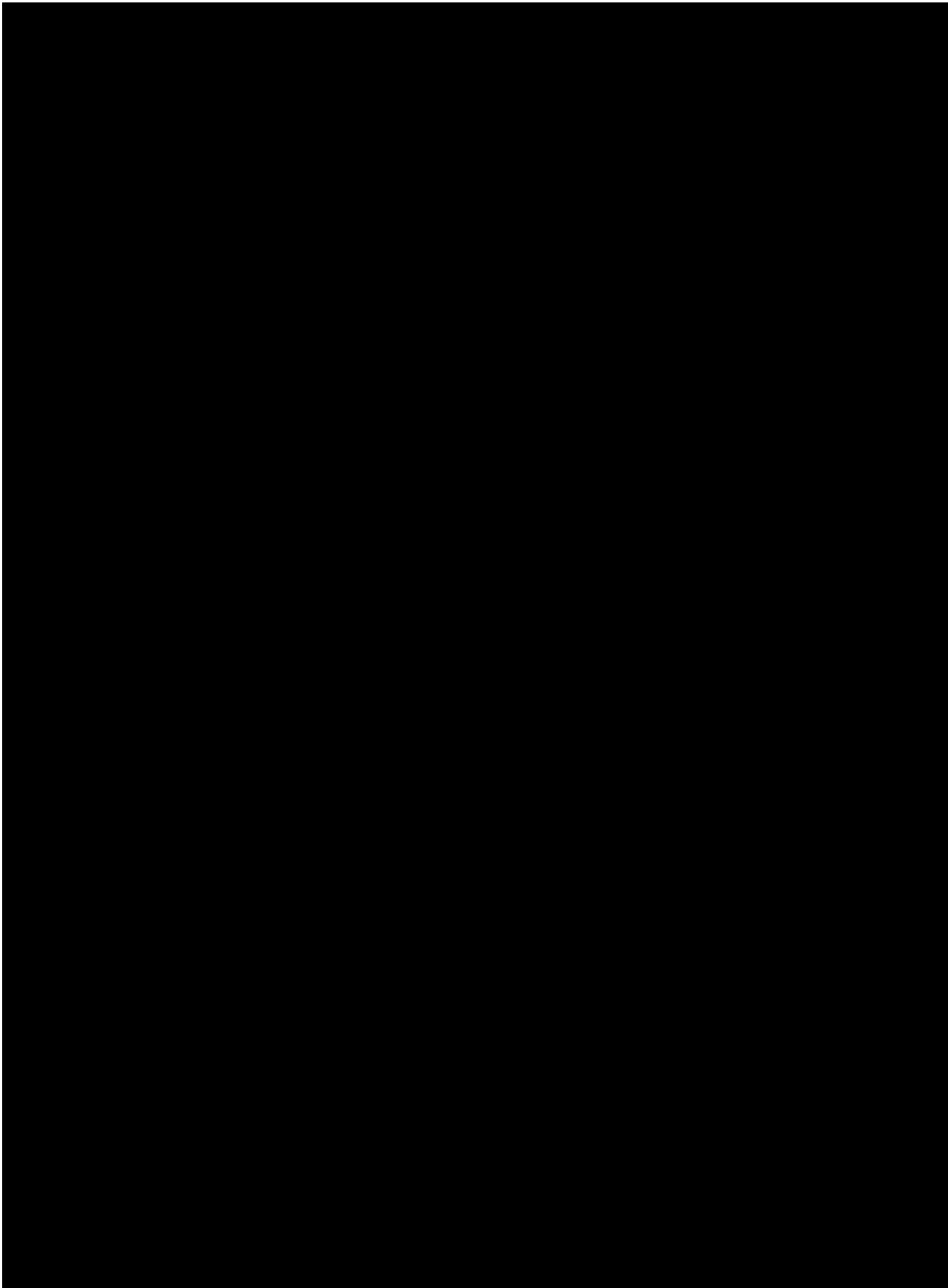
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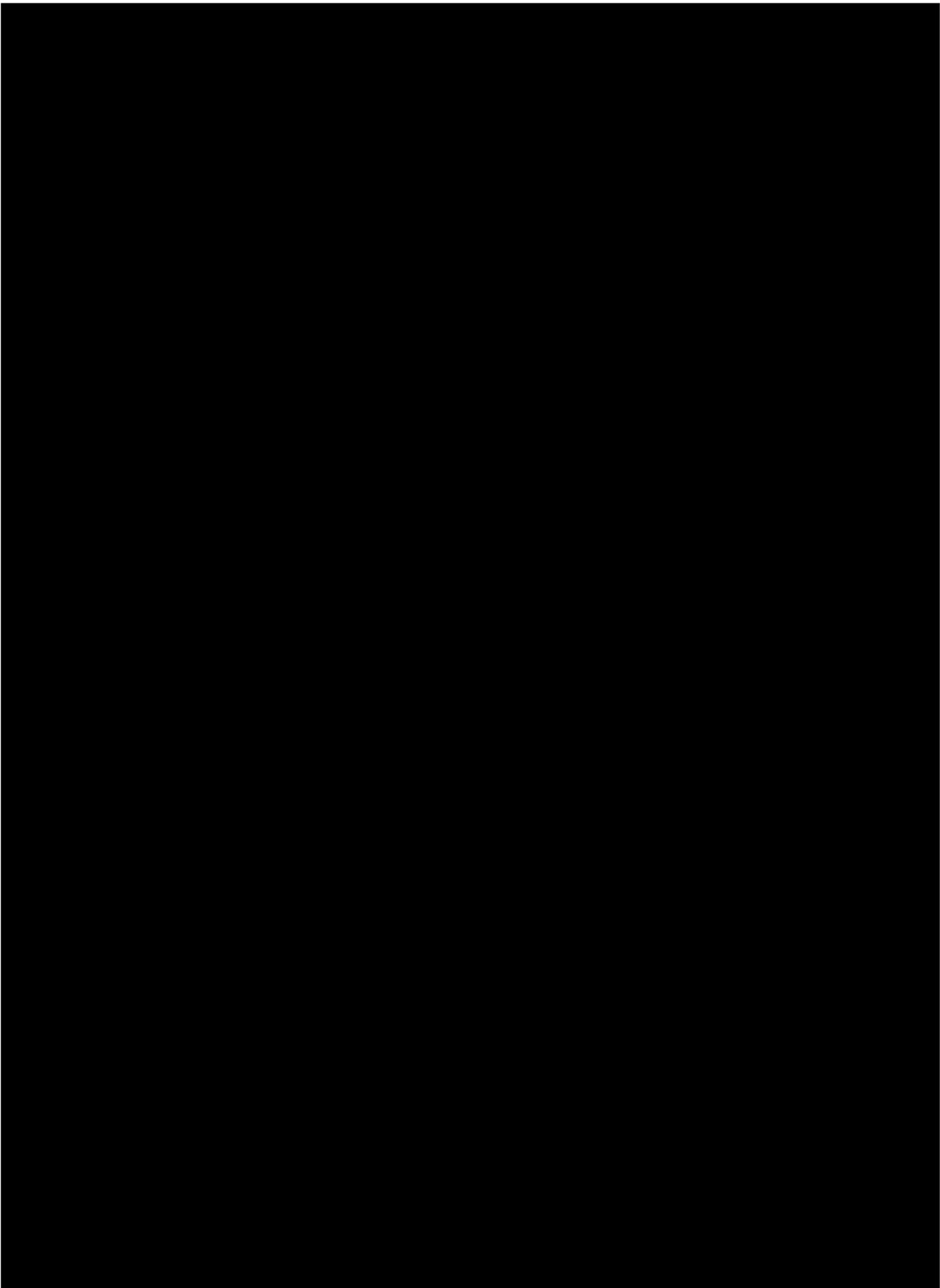


# SUPERCritical RUN

## STANDARD OPERATING PROCEDURES







# DRY & DECARB OVENS



## NRTL CERTIFICATION

CAN/CSA-C22.2 No. 61010-1:2012  
+ UPD No. 1:2015-07 + UPD No. 2:2016-04

CAN/CSA-C22.2 No. 61010-2-010:2015

UL 61010-1:2012/R:2016-04

UL 61010-2-010:2015

EN 61010-1:2010

EN 61010-2-010:2014



MODEL CDO-5  
BENCHTOP



MODEL CDO-28  
INDUSTRIAL

## CAPACITY

Interior:

4.9 Cubic Ft

21"W x 19.44"D x 20.75"H

Exterior:

34.1"W x 28.1" D x 38.75"H

Access Port:

2.75" Diameter (Rear)

28 Cubic Ft

31.5" W x 26" D x 60.5" H

43" W x 34.3" D x 85.5" H

2.75" Diameter (Rear)

## SHELVING

2 Each. Adjustable  
20.75"W x 19"D

Maximum:

9 Shelves/4 Mesh Bags

Weight Capacity:

50 lbs

Mesh Bags:

2 Included - 15.5"D x 21"W

6 Each. Adjustable  
31.1" W x 23.9"D

16 Shelves/10 Mesh Bags

75 lbs

6 Included - 28.5"W X 22"D

## TEMPERATURES

Range:

Ambient +26° to 350°F

Without Humidity Sensor:

To 500F

Uniformity:

1.5F @ 240°F

Ambient +26° to 350°F

To 500F

3.6F @ 240°F

## AIRFLOW

Across Shelf Space:

15.2 cubic ft per min

17.7 cubic ft per min

## FACILITIES

Power:

120V / 1ph / 14A

Cord Type:

110V-120V NEMA 5-15 9'5"L

Air Intake (Adjustable):

Side Vents

Air Exhaust (Adjustable):

Top 2.75" Dia

Recommended Clearance:

12-24" all sides

230V-240V/1ph/26A (208V OK)

None. Must Be Hardwired

Top 2.75" Dia

Top 2.75" Dia

12-24" all sides

## WEIGHT

Shipping:

208 lbs

258 lbs

565 lbs

75 lbs

## WANT TO LEARN MORE?

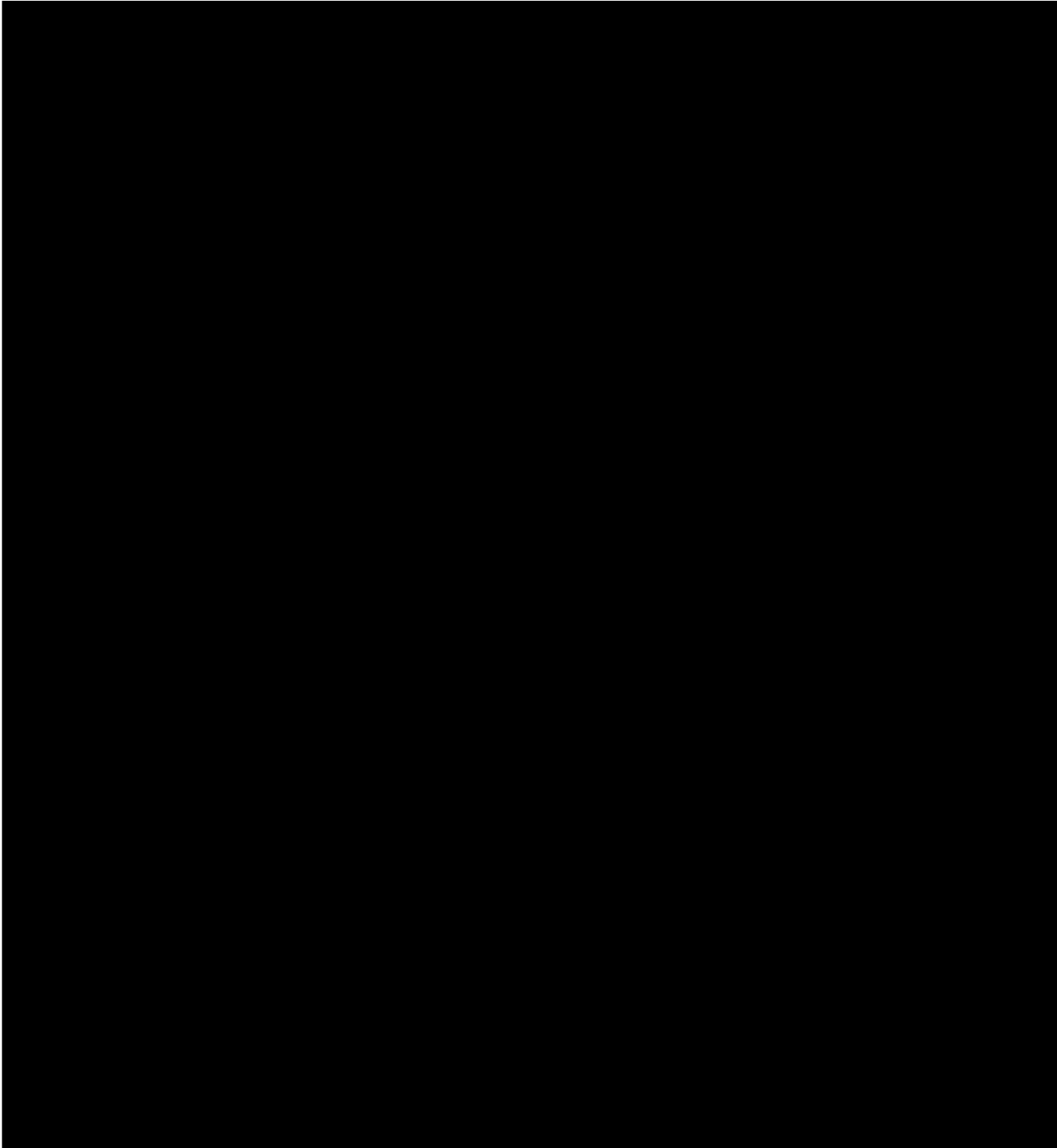


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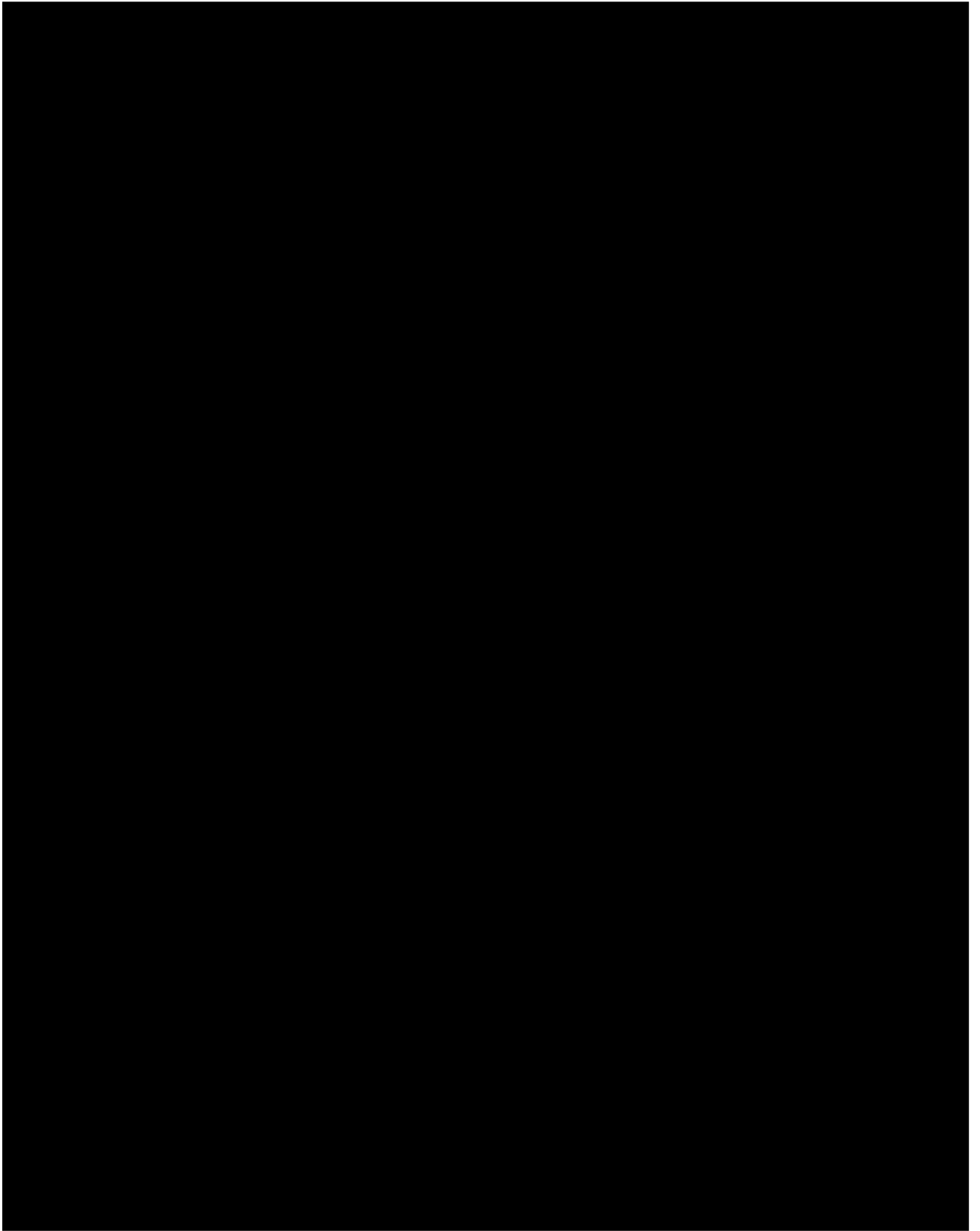
# ETHANOL RECOVERY USING HEIDOLPH

## STANDARD OPERATING PROCEDURES





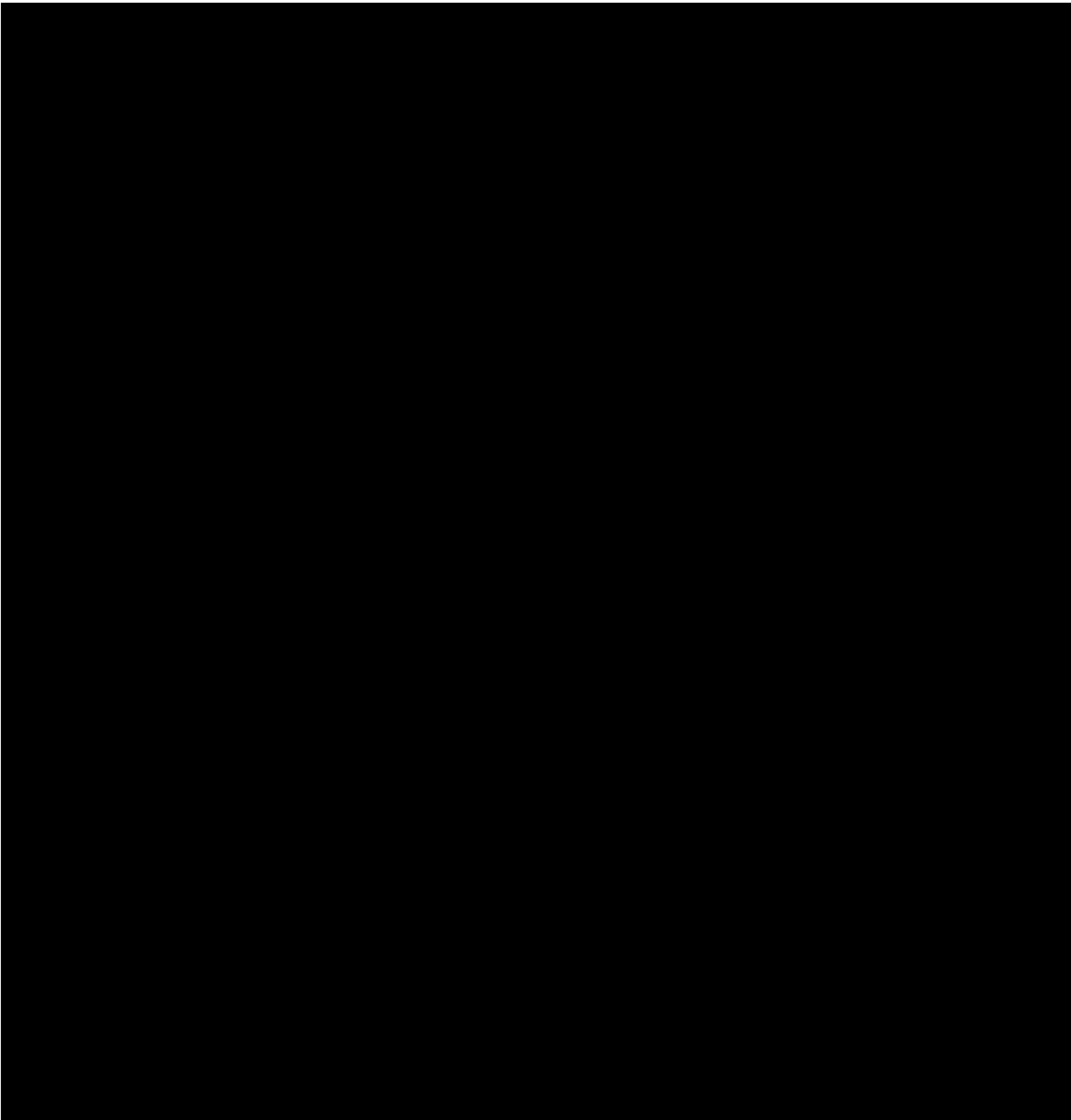


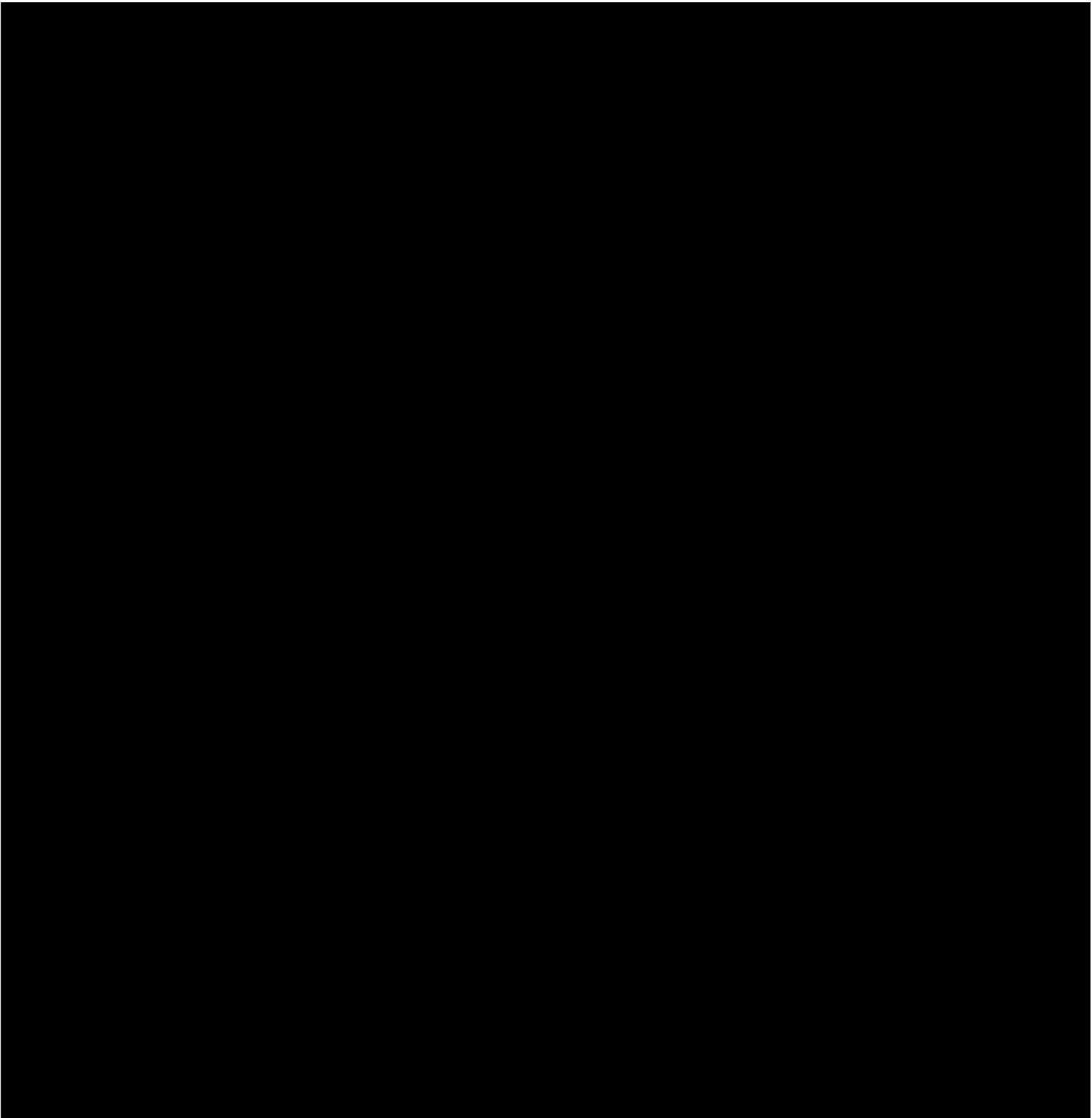




## WINTERIZING / FILTERING USING INFINITY

### STANDARD OPERATING PROCEDURES

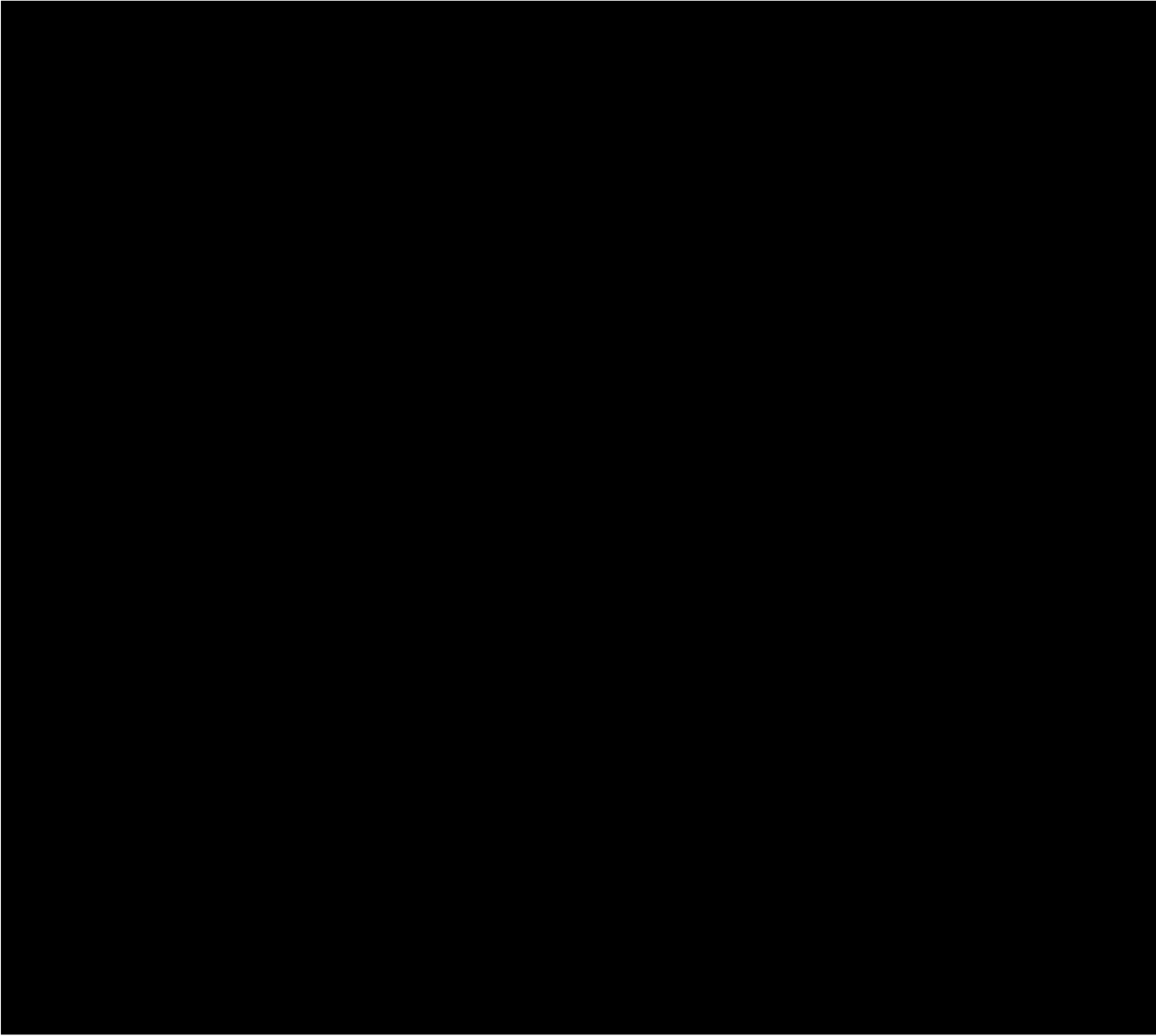






## ULTRASONIC CLEANER

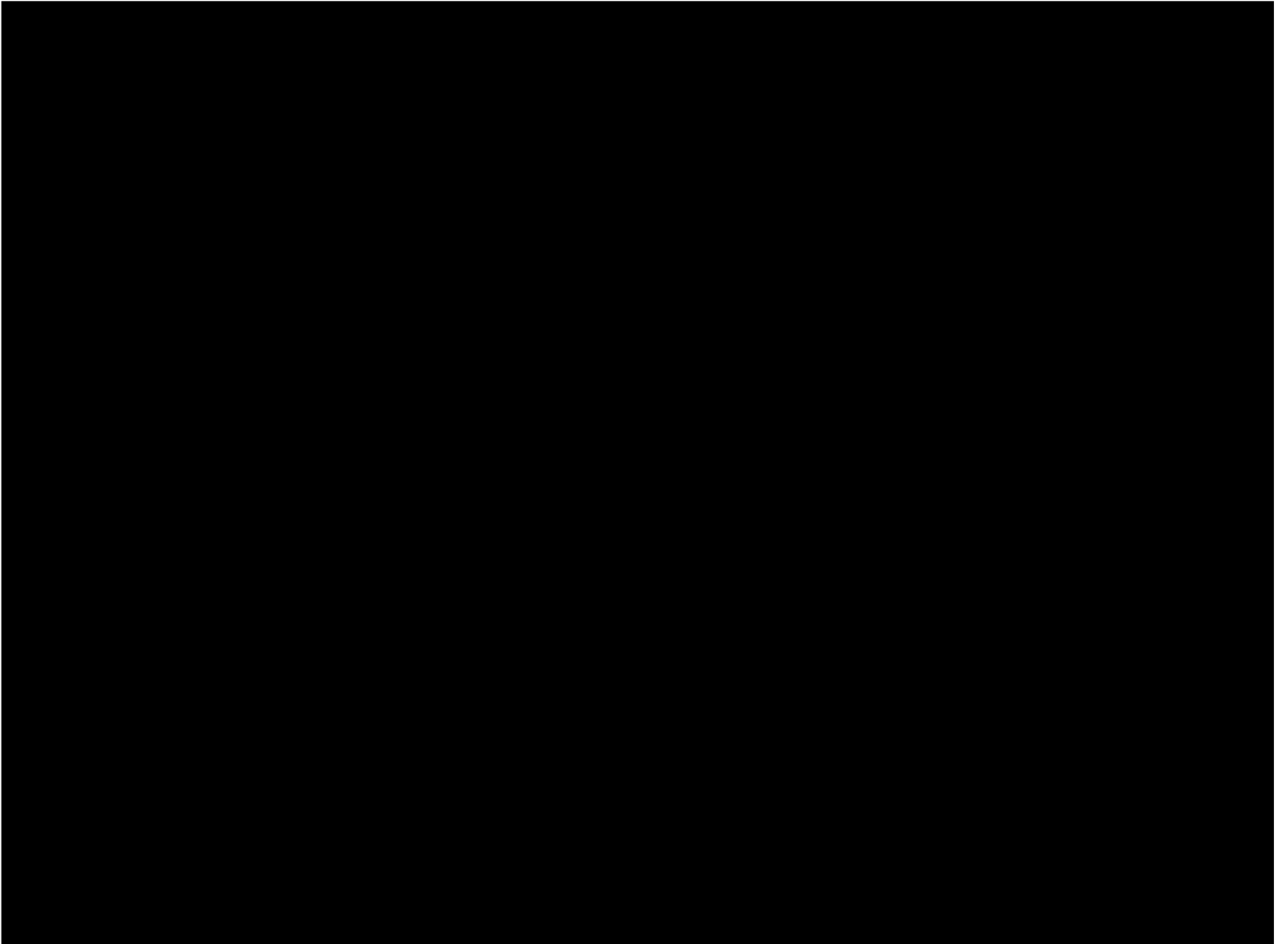
### STANDARD OPERATING PROCEDURES





## **SUPERCritical FLUSH**

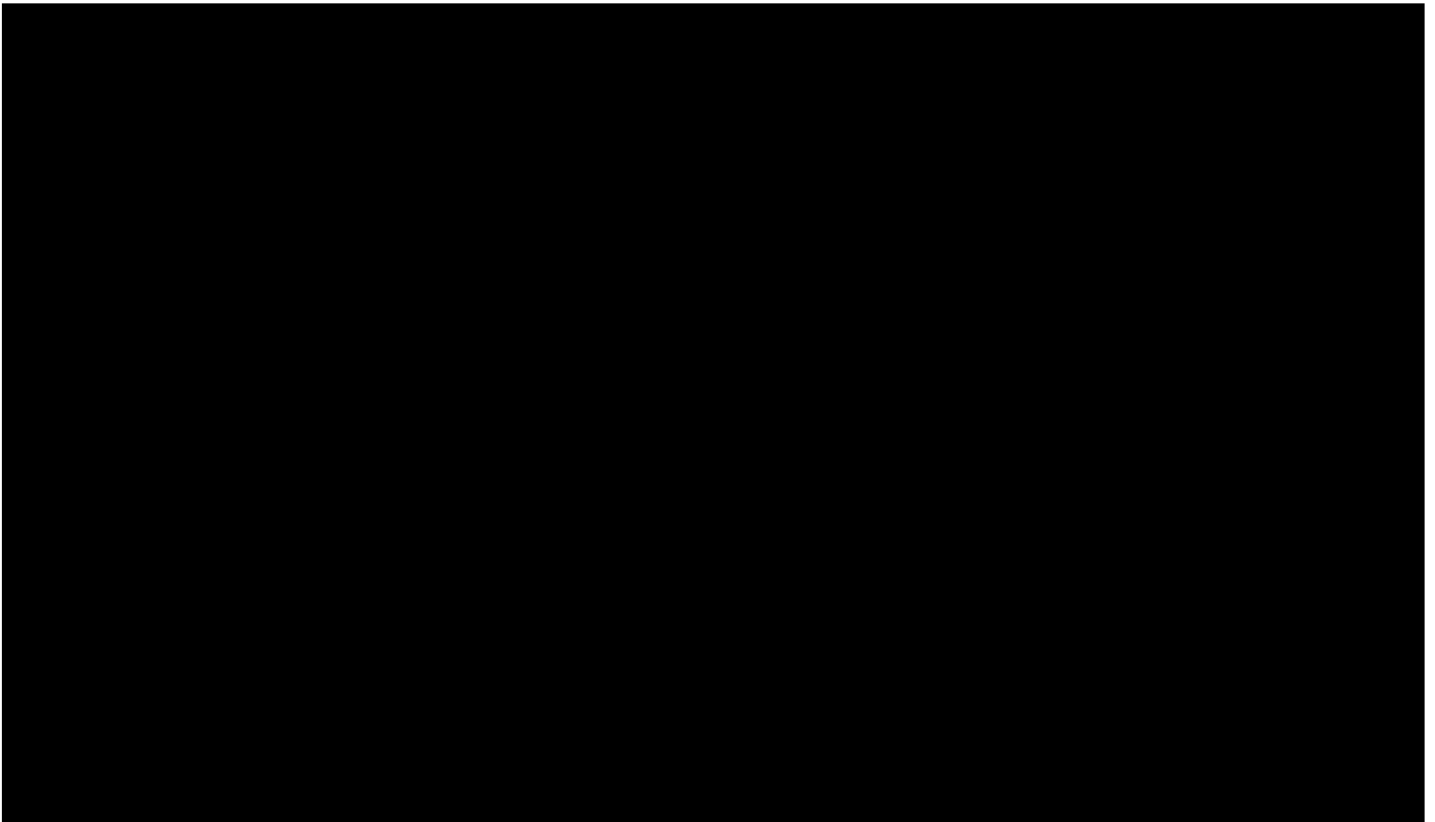
### **STANDARD OPERATING PROCEDURES**





## GRINDING FOR BABY JANE

### STANDARD OPERATING PROCEDURES

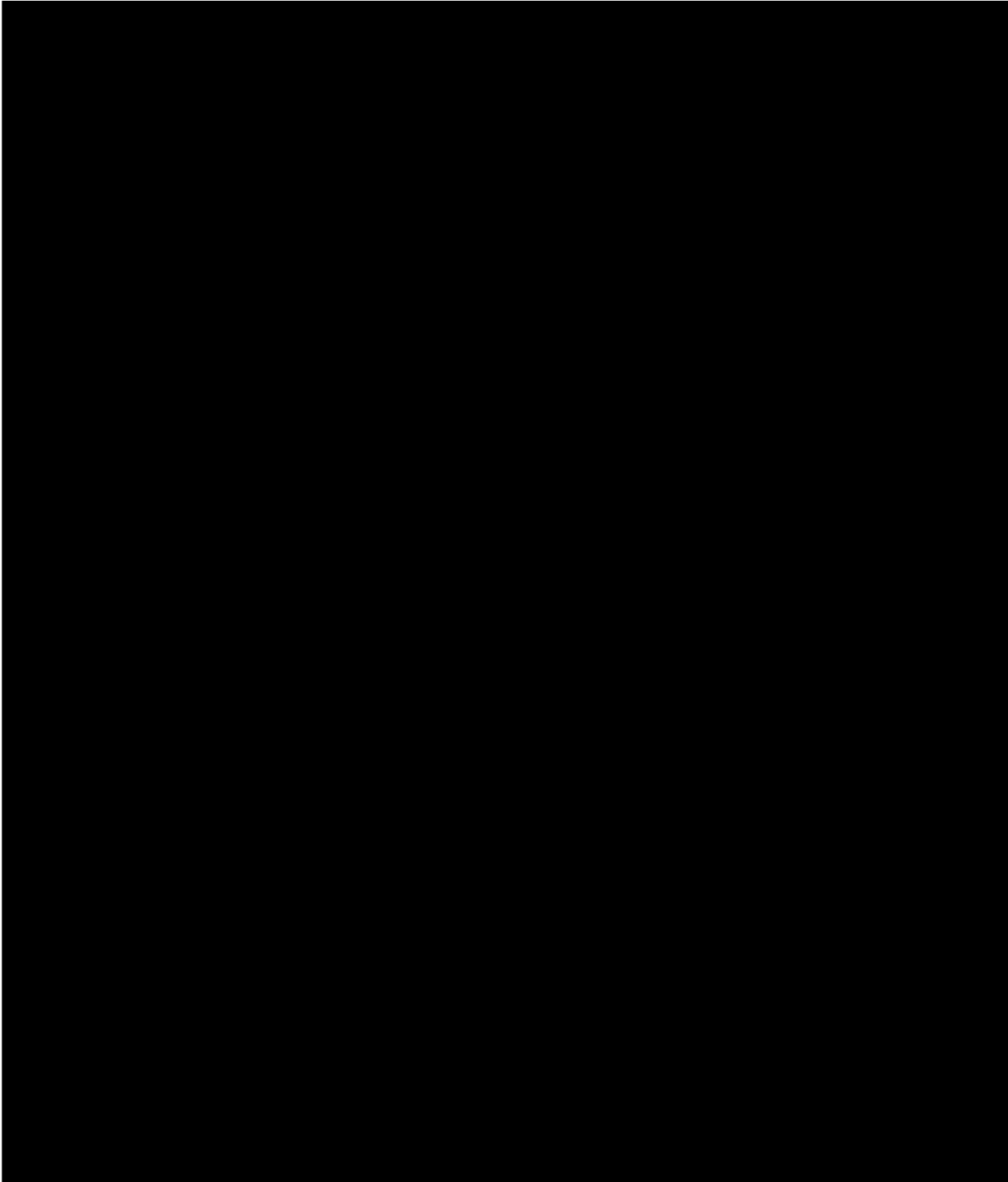


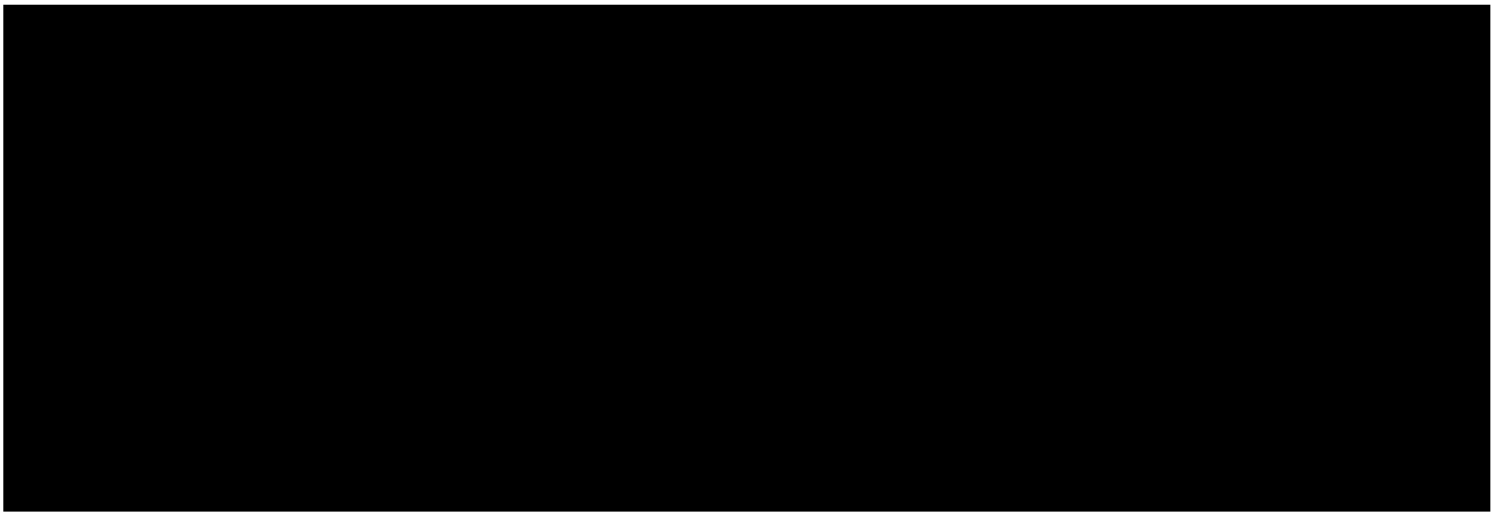




# ETHANOL RECOVERY USING GLASS REACTOR

## STANDARD OPERATING PROCEDURES

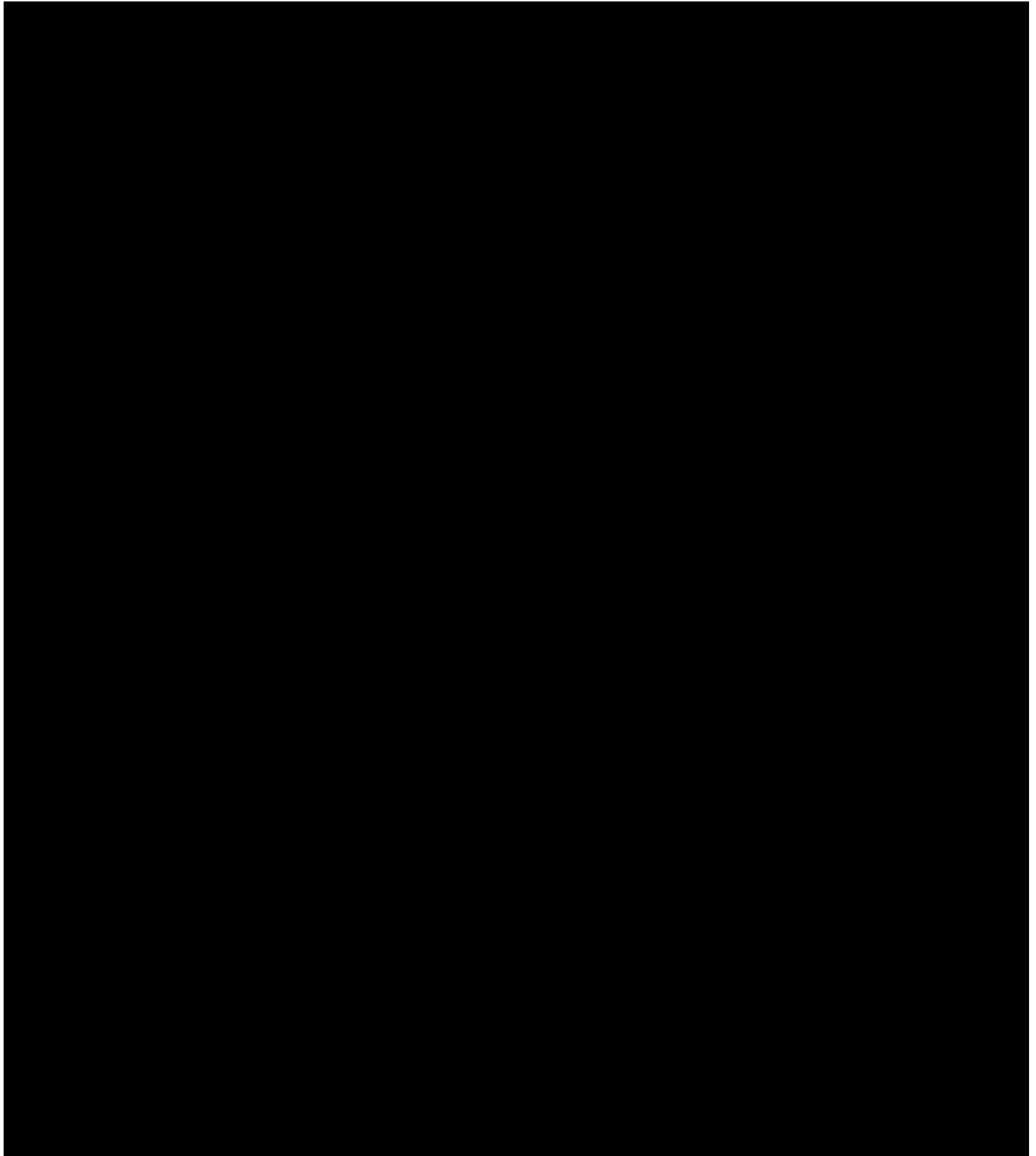


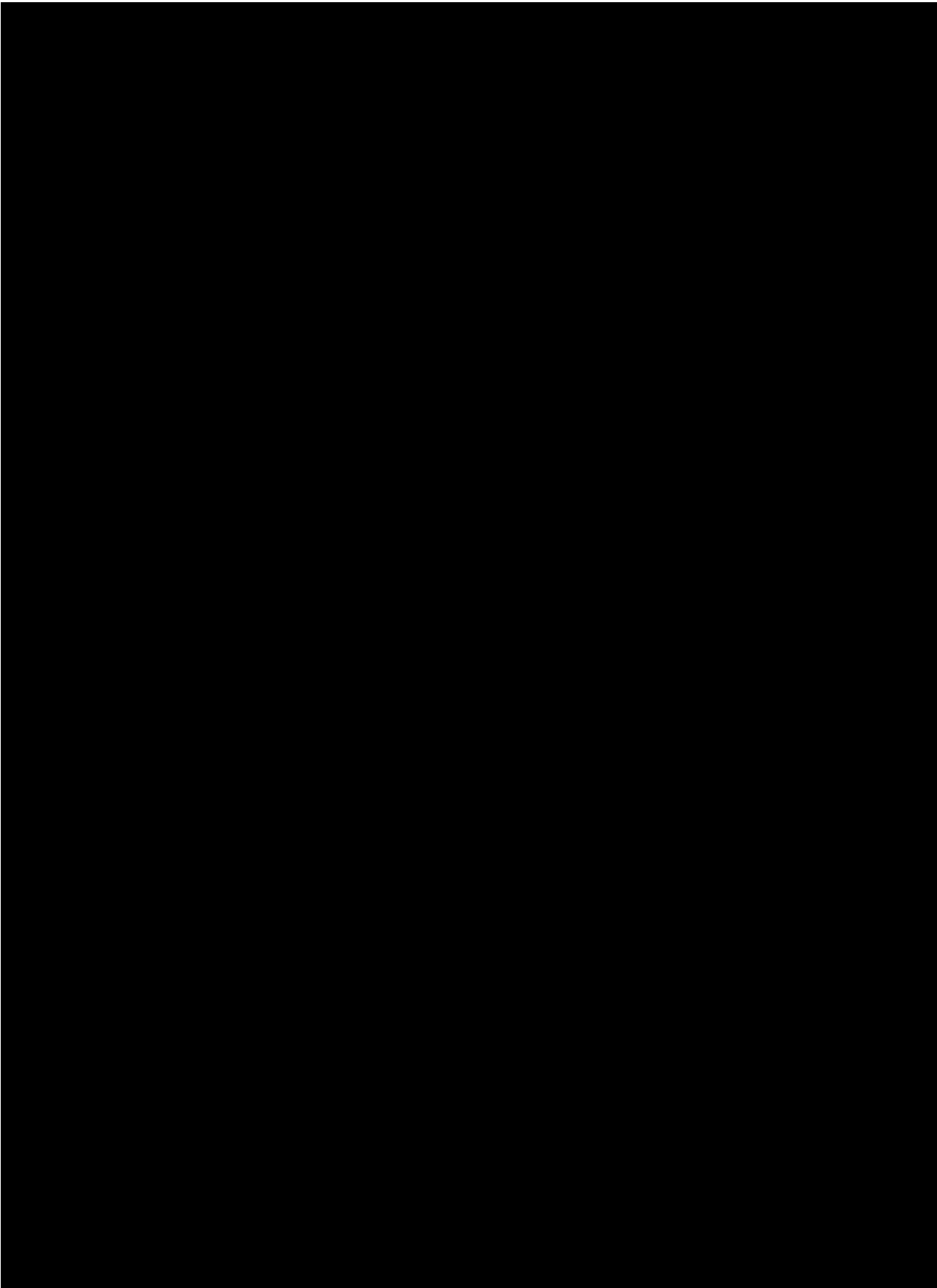




## DECARBOXILATION USING TRUSTEEL DR10

### STANDARD OPERATING PROCEDURES



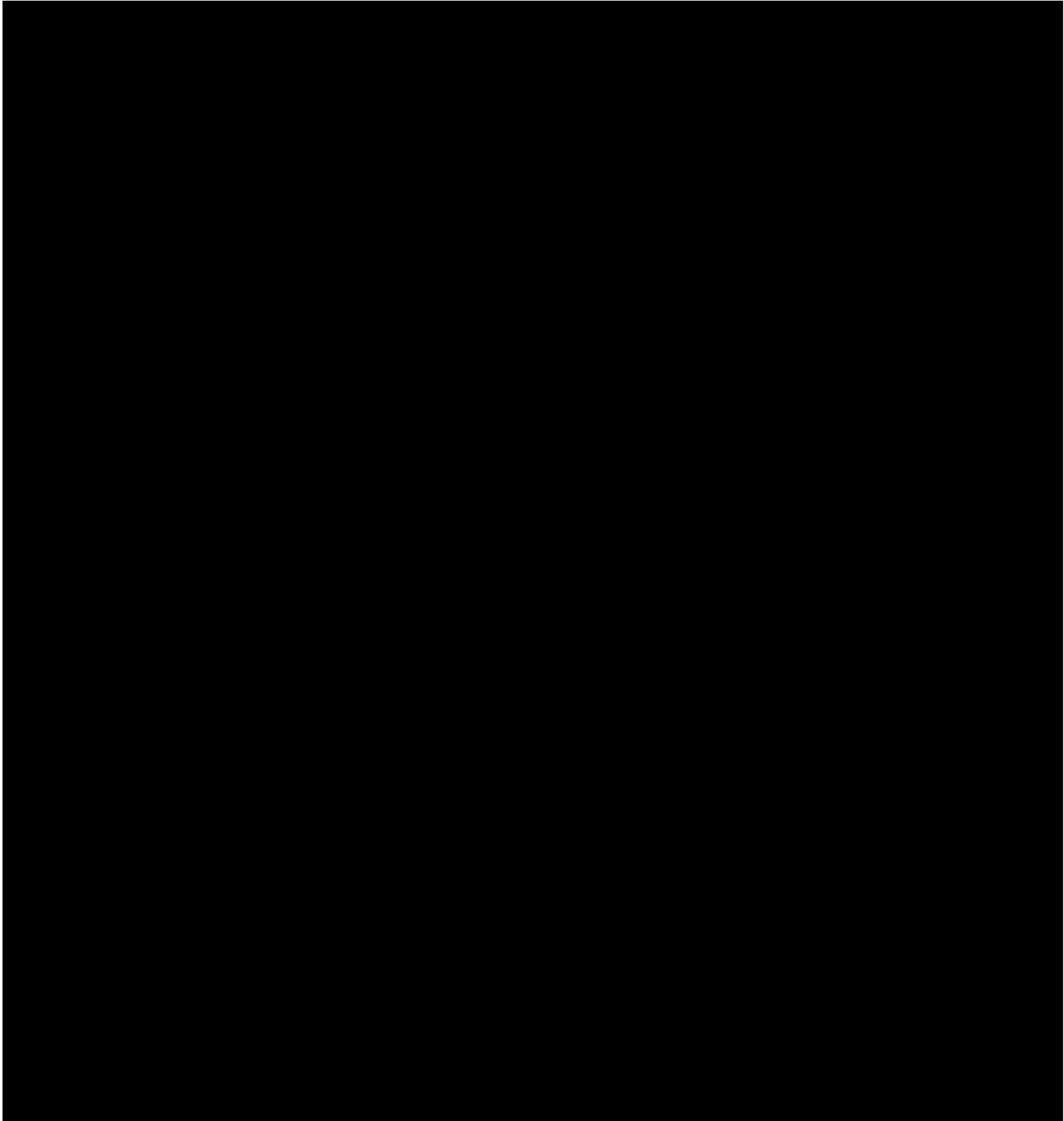


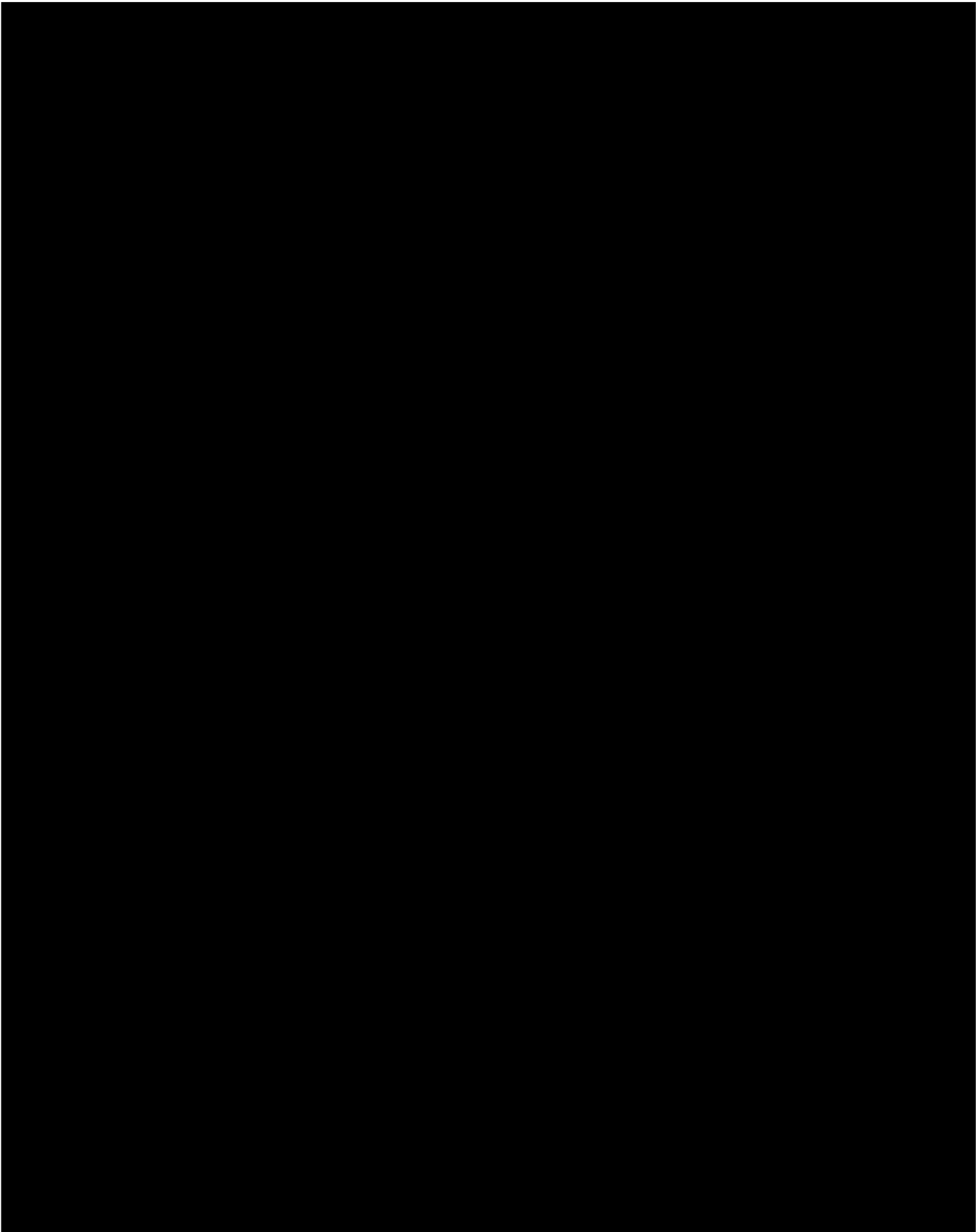


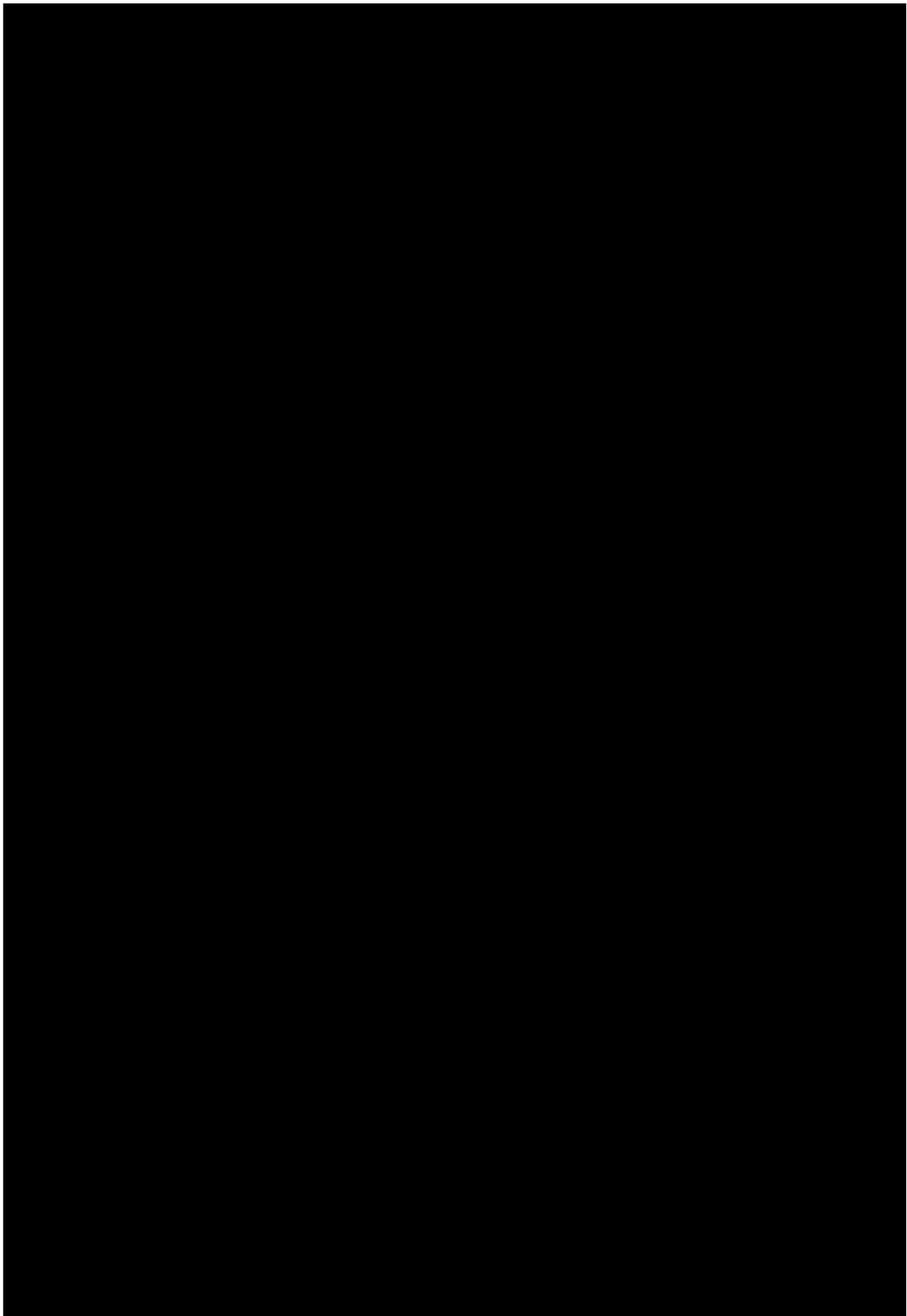


# Oil Refinement [REDACTED]

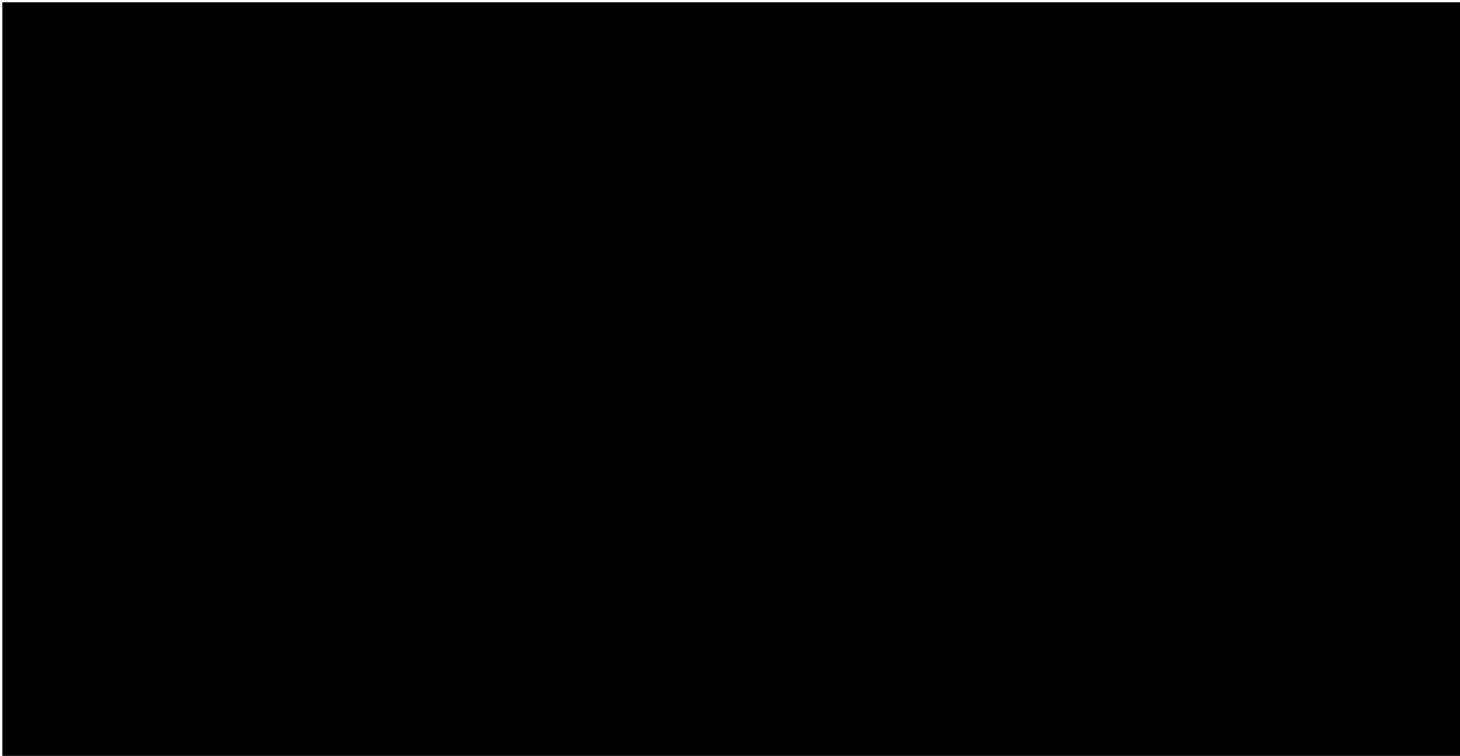
## STANDARD OPERATING PROCEDURES











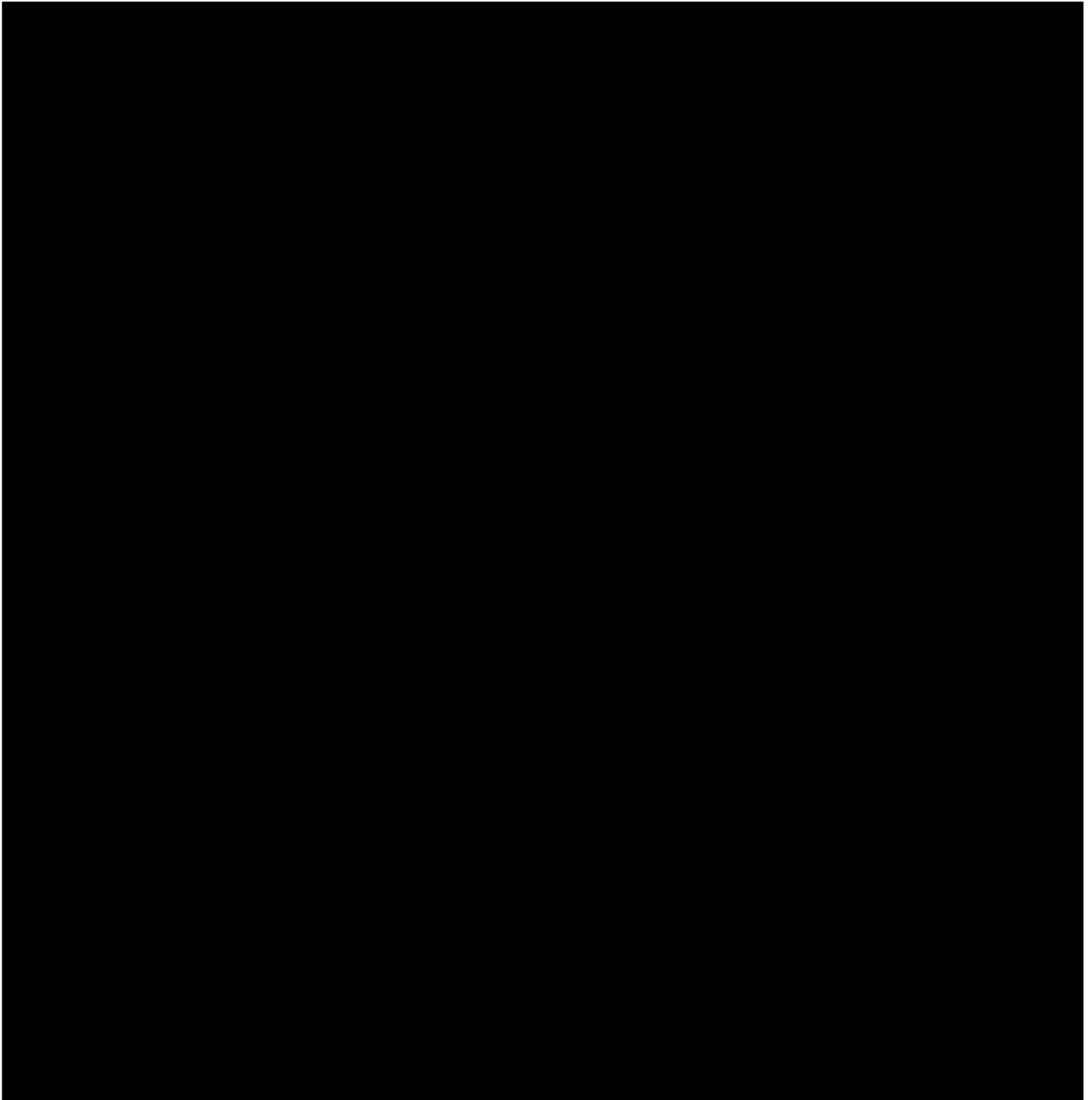


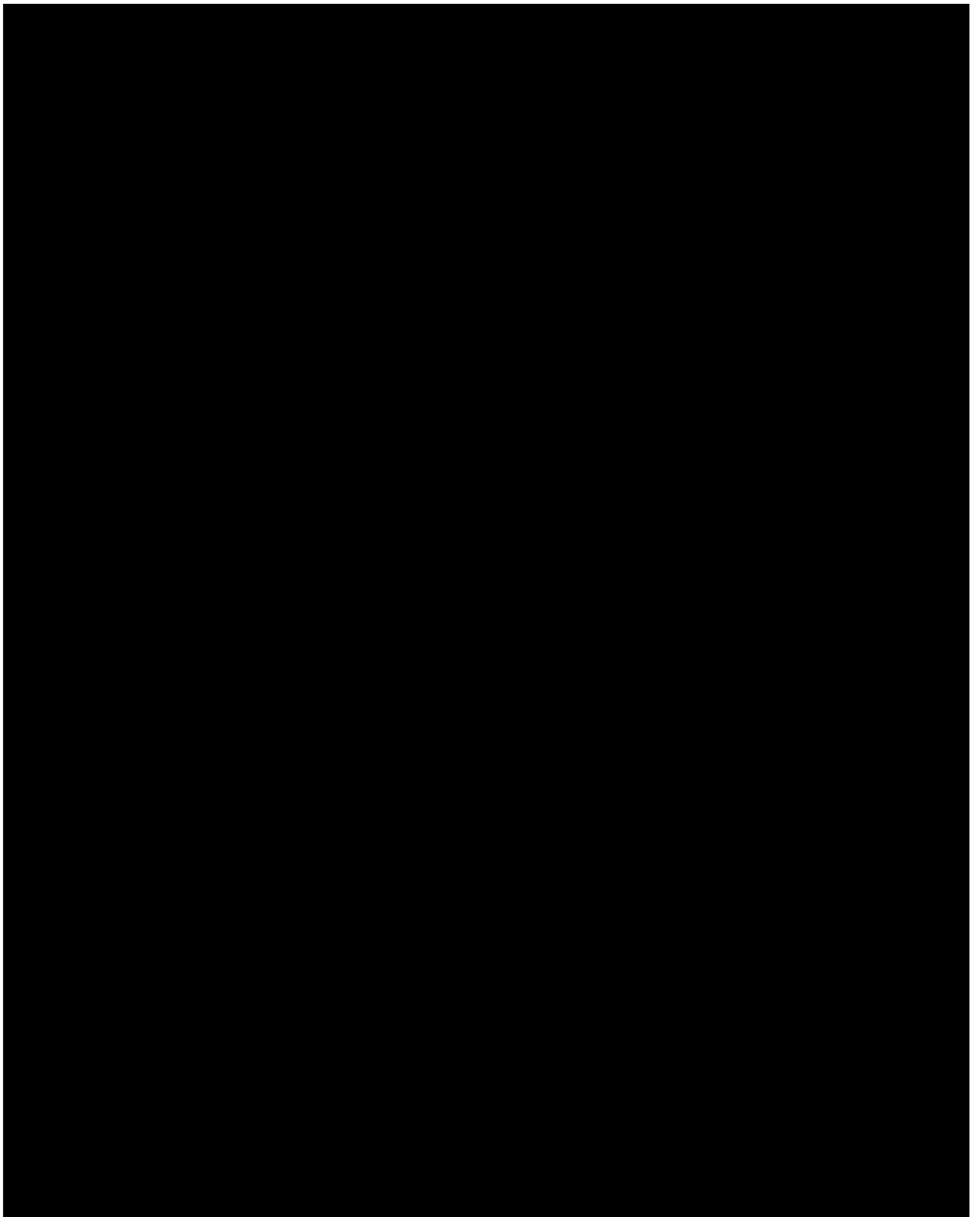
## Solventless Hash Rosin - Pressing SOP

Life Elevated Processing

Department: Processing

Disclaimer: *Life Elevated Processing's Standards of Practice are subject to change. Be thorough and check your work.*





### STEP 3: SUPER CRITICAL RUN

#### Prep

1. Check accumulators level; must be at 50% minimum to start any run
2. Reduce Accumulator pressure; **BEFORE EVERY RUN** you must ensure Co2 is cycled through the condenser with refrigeration **OFF** for 5 minutes
3. Close valve #1
4. Ensure pump is pressurized with Co2
5. Open valve #14
6. Turn ENABLE Co2 valve is **ON**
7. Open valves #15 and #25
8. On control panel;
  - a. Turn HYDRAULIC PUMP to **ON**
  - b. Turn HYDRAULIC ENABLE to **ON**
  - c. Adjust HYDRAULIC PRESSURE to 25%
  - d. Adjust HYDRAULIC FLOW to 50% increase to 80% when flow established
9. Cycle Co2 through condenser for 5 minutes
10. Turn ENABLE CHILLER VALVE to **ON**
11. Wait for accumulator pressure to fall below 300 PSI and temperature below 10 degrees F
12. Turn ENABLE CHILLER VALVE to **OFF**
13. Turn **OFF** the pump on control panel;
  - a. Turn HYDRAULIC ENABLE VALVE to **OFF**
  - b. Turn HYDRAULIC PUMP to **OFF**
  - c. Adjust HYDRAULIC FLOW to 0
  - d. Adjust HYDRAULIC PRESSURE TO 0
14. Turn ENABLE Co2 VALVE to **OFF**
15. Close valve #15

#### Start Run

1. Warm to 80 degrees, Cyclone & separator
2. Open valves #25 & #14
3. Close valve #15
4. Open valve #10 (side A) valve #11 (side B) to open flow path
5. Turn cyclone valve 1½ turns
6. Valve #7 & #8 closed
7. Open: valve #5 & #3 (Side A)  
valve #6 & #4 (Side B)
8. Turn on Hydraulic Pump
9. Enable Hydraulic Valve
10. Turn Co2 **ON**
11. Set super critical A or B
12. Set Hydraulic Flow to 60 %
13. Set Hydraulic Pressure to 40%
14. Open valve #1
15. Increase flow to 100 percent once machine is running with no abnormalities.
16. Bump hydraulic pressure **gradually** two points at a time
17. Once extraction pressure is between 2,000 – 2,300 *slowly* open (crack) valve #8 (side A) or valve #7 (side B)
18. Turn on chiller at 2250 PSI in Extractor A or B depending on side run.
19. Cyclone needs to stay between 50 – 60 degrees (55 ideal) *The temperature will drop rapidly when the chiller is turned on. Carefully manage the dissent of the temperature in the cyclone when pressure is rising and chiller is on.*  
Extractor performs best between **3,750 and 4,200 PSI** (hydraulic pressure usually between 74-82 PSI)
20. Adjust cyclone flow: **IN** for warmer **OUT** for cooler temperature

#### End Run

1. Close valve #1
2. Lower hydraulic pressure to 0 then flow to 0
3. Turn **OFF** Co2 button
4. Turn **OFF** HYDRAULICS ENABLED button
5. Turn **OFF** Hydraulic pump switch
6. Turn **OFF** SUPER CRITICAL button (Side A or B)
7. Start opening Hot/Cold valve (continue for recovery period)
8. Open valve #15 to relieve pressure on pump then close
9. Turn **OFF** chiller at 500 PSI
10. After Co2 recovery to accumulators close valve #7 for Side B valve #8 for Side A
11. Isolate the extractor before starting again;
  - a. Side B close valves #6 & #8
  - b. Side A close valves #3 & #5
12. Reset Side A or Side B temperatures on monitor
13. Vacuum and clean out vessel
14. Clean cyclone extraction point
15. If you plan to **shut down** (vent **OFF** to 0 PSI left in accumulators (open lids));
  - a. Side A open valve #34
  - b. Side B open valve #33
  - c. Open valve #29 **gradually**
16. If you plan to do another run

If gas is present in the accumulators it can be used from one extractor to the other. After Co2 recovery to accumulators has been completed.

1. Start Side A
2. Open valve #33
3. Slowly open valve #34

1. Start Side B
2. Open valve #34
3. Slowly open valve #33

**Start from extractor being shut down;** Fill extractor from Dewer make sure extractors are isolated and valve #29 is closed

1. Open Dewer gas valve
2. Open valve #23
3. Open valve #24
4. Slowly open valve #34 (Side A) valve #33 (Side B)
5. Need to be greater than 200 PSI

## **SUPER CRITICAL FLUSH**

***A super critical flush MUST be performed after every two runs***

1. Turn on cyclone/separator heating jacket to 80 degrees
2. Close extractor chamber valves #3, #4, #5 and #6
3. Pressurize condenser, filter, cyclone/separator
  - a. Close valves #1, #14, #15 and #24
  - b. ENABLE Co2 valve *OFF*
  - c. Pump pressure to less than 200 PSI
  - d. Open Co2 gas supply on dewer
  - e. Slowly open valve #23
  - f. Slightly open valve #21 and bring pump pressure within +/- 100 PSI of accumulator
  - g. When pressure is equalized close valves #21 and #23
4. Open valve #1
5. Open valves #2, #7, #8, #10, #11 and #25
6. On monitor toggle EXTRACTOR A or EXTRACTOR B to super critical
7. Turn on hydraulic pump
8. Pump Co2 at 1,200 – 1,500 PSI and greater than 87 degrees for 10 – 15 minutes